APPENDIX G RESPONSE TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

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Response to Comments on the DEIS

On October 19, 2012, a Notice of Availability (NOA) was published in the Federal Register announcing the availability of the Jack Rabbit to Big Sky Meadow Village 161 kV Transmission Line (Project) Draft Environmental Impact Statement (DEIS). A news release was published on October 20, 2012 announcing the release of the DEIS, and an informational meeting concerning the Project was held in Big Sky on November 15, 2012. The public comment period closed on December 3, 2012. Comments were received from:

1. Stephen Abbott, Bozeman MT (canyon resident)
2. Patrick Asay, NorthWestern Energy
3. Jason Berry, Ladera Ranch, CA (property owner on Lone Mtn Trail Rd)
4. Sherry Berry, Lake Forest, CA
5. Sherry and Jim Berry, Big Sky, MT (property owner on Lone Mtn Trail Rd)
6. Julie DalSoglio, USEPA
7. Sara Durnam Anderson, Bozeman, MT
8. Jaden Erwin (property owner on Lone Peak Trail, Big Sky)
9. William Erwin (property owner on Lone Mtn Trail Rd)
10. David Engstrom (Cave Creek cabin owner)
11. Edwin and Margaret Flower (Cascade Creek cabin owner)
12. Patrick Flowers, MT Fish Wildlife and Parks
13. Gary and Grace France (Cascade Creek cabin owner)
14. Thomas Johnson, President Cascade Creek Cabin Owners Association
15. Celeste Haynes, Chico CA
16. Mary Ann and Bob Noack, Lake Oswego, OR (Cascade Creek cabin owner)
17. Peter Norlander, Livingston, MT
18. Kathryn Ore, MT SHPO
19. Ella May and Jim Owenhouse, Bozeman, MT (Cascade Creek cabin owner)
20. Timothy and Helen Pinson, Gallatin Gateway, MT (Cascade Creek cabin owner)
21. Jean Riley, MT Dept of Transportation
22. Bill Scharnberg (Greek Creek cabin owner)
23. Dave and Maryellen Scherer (Cascade Creek cabin owner)
24. Jean Steelman (Cave Creek cabin owner)
25. Robert Stewart, DOI
26. Dawn Marie and Robert Tol (Cave Creek cabin visitor)
27. Anne Woodruff, Gallatin Gateway, MT (canyon resident)

These comments are located after the agency responses, below, in the order shown above. Comments received were sorted by subject matter, and similar items were grouped together for a single response. Agency responses to these comments are discussed below.

COMMENTER	COMMENT AND RESPONSE
Comment 1 Cascade Creek cabin owners	Cascade Creek Tracts – Support for Alternative 3 – Relocation of transmission line to east to minimize impacts to Cascade cabins Numerous comments were received that voiced support for relocation of the transmission line to the east of the Cascade Creek cabins, as well as forest plan amendments to establish a new alignment. Comments noted that the Cascade East alternative serves in the best interest of preserving the integrity, history, and heritage of the area, and noted that Alternatives 2 and 4 would have a higher and more pervasive impact to some of the most scenic and highly used recreational areas on the Gallatin National Forest (including Lava Lake Trailhead, the mad mile segment of the Gallatin River heavily used for white water rafting, fishing access points, and recreation residences). Commenters noted that many of the Cascade cabins are close to 100 years old, and a large new power line would take out dozens of old tress and change the aesthetic nature for several cabins. Other concerns about a higher voltage transmission line running through Cascade Creek tracts included health and safety (cancer); damage to roads, bridges, and culverts; and property damage.
Response: These comments were considered as part of the decision.	
Comment 2 Cave Creek cabin owners and visitors	Cave Creek Tracts – Support for Alternative 3 – Relocation of transmission line to west of Cave Creek cabins Numerous comments were received that voiced support for relocation of the transmission line to the west of Cave Creek tracts. Concerns expressed about a higher voltage transmission line running through Cave Creek tracts included removal of old trees, impact to property values, and health and safety.
Response: These comments were considered as part of the decision.	
Comment 3 Property owners near MT Hwy 64	Transmission Route / Visual Impact to Lone Mountain from MT Hwy 64 Several people commented that the existing alignment along MT Hwy 64 would result in a negative visual impact to Lone Mountain and property values. Suggestions were made for realignment: 1) higher up on the south side of the mountain and on Forest Service land; and 2) rerouting from private property where it crosses the North Fork of the West Fork of the Gallatin River to an alternative route along Big Sky Spur Rd and then across the North Fork of the West Fork of the Gallatin at a right angle to the new substation.
Response: The DEIS considered a realignment of the transmission line along MT Hwy 64 as an alternative considered, but dismissed. Chapter 2.0 states, "Near the substation at Big Sky, a landowner requested that the line be moved from the highway ROW, which happened to be in front of his home to upslope NFS lands. Moving the line to this location would impact sensitive bighorn sheep wintering habitats, would move the line into the IRA, and would shift scenery impacts to homeowners adjacent to the GNF boundary. This reroute would unduly and negatively impact NFS land. The GNF also received a request to consider moving the line on private lands where the agency has no authorization. One principal criteria used to evaluate SUP applications by the Forest Service is that applications for private use of NFS lands would not be granted if locations and development on lands outside of NFS lands is reasonably possible. In these cases, there are legal easements on private land and negative resource impacts to NFS land if the line were moved. For these reasons, these rerouting requests on the border of the NFS lands with private lands were eliminated." Several residents commented on the DEIS and again asked the Forest Service to consider a realignment away from MT Hwy 64, stating that the current alignment would negatively impact the view of Lone Mountain. On December 18, 2012, the Forest Service contacted people that had voiced these concerns to get more specific information about the requested realignment, and asked them to provide their suggested realignments on a map. On December 26, 2012, the Forest Service received additional information with a map identifying the requested realignment. The Forest Service evaluated concern that the upgraded transmission line would negatively impact the view of Lone Mountain from MT Hwy 64, and considered the proposed realignment. The Forest Service determined that the most sensitive view to the summit of Lone Mountain, where the power line is coincident with the view of the power line (against the sky, framed by the trees and side slopes), is where the Big Sky Spur Road is next to private land, not NFS land. Where the line passes across NFS land, west of the US Highway (US Hwy) 191-Big Sky junction, there is no reason to recommend moving the alignment up the slope to the north. The proposed increase in height of the poles may cause one of two poles along this stretch to become slightly sky-lined to viewers in cars along the road who look uphill and to their right, but the enlarged poles would not become visually dominant. Through the stretch bordered by private land, the Forest Service does not have jurisdiction on private land, nor on the ROW across private land (See Project Record).	

COMMENTER	COMMENT AND RESPONSE
Comment 4 Canyon residents	Transmission route along private residences / land along US Hwy 191 A couple people noted that the transmission line runs close to or across their property, and close to cabins or residences (in the general vicinity of Hell Roaring Creek and the Karst area, in between Moose Creek and Tamphrey Creek). They expressed concerns about the health and wellbeing of canyon residents exposed to a higher voltage transmission line (specific concerns included increased risk of radiation and cancer). There was a request to move the transmission line off private property and onto national forest.

Response: Concerns about health and safety were raised as an issue during the scoping period and analyzed in the DEIS.

The National Institute of Environmental Health Sciences (NIEHS) (NIEHS 2002) notes that for most health outcomes, there is no evidence that EMF exposures have adverse effects. There is some evidence from epidemiology studies that exposure to power-frequency EMF (this refers to a low frequency source of electric and magnetic fields created by power system facilities such as power lines and substations) is associated with an increased risk for childhood leukemia. This association is difficult to interpret in the absence of reproducible laboratory evidence or a scientific explanation that links magnetic fields with childhood leukemia (NIEHS 2002).

There are two broad types of electric and magnetic (EMF) analysis and regulations that apply to transmission lines: 1) engineering or safety-based, and 2) health effects. Engineering-based electric field levels are intended to limit electric discharges that could cause a nuisance shock. There is also a safety code to limit more harmful electrical shocks from electric fields (National Electrical Safety Code [NESC]). There are no limits that have been set by a governing body based on known or established health effects. Because there is limited scientific evidence (which cannot be reasonably interpreted as noted by NIEHS in the previous paragraph) establishing health effects resulting from EMF exposure, there are no federal health-based standards for limiting exposure to those fields.

The Draft and Final EIS also considered the request to reroute the line off private lands onto National Forest as an Alternative considered but dismissed from detailed study. The EIS indicates moving the line up slope near Tamphrey would result in greater disturbance to NFS lands by creating more vegetation clearing and impacting more new lands; and result in no identifiable benefits to the NFS lands over the current alignment, and offered no reduction in impacts to National Forest resources. The GNF also received a request to consider moving the line on private lands. This EIS considers the effects on NFS land to support a decision to authorize use on NFS lands. Private land changes should be negotiated directly with NorthWestern Energy for altering their easement. One principal criterion used to evaluate SUP applications by the Forest Service is that applications for private use of NFS lands would not be granted if locations and development on lands outside of NFS lands is reasonably possible. In these cases, there are legal easements on private land and new resource impacts to NFS land if the line were moved. For these reasons, these rerouting requests on the border of the NFS lands with private lands were eliminated (page 2-50 of DEIS).

Comment 5: Greek Creek cabin owner	Use Existing ROW to avoid tree clearing and increased river access There was a request to keep the transmission line on the shoulder of US Hwy 191 for the entire route. The commenter does not support clearing of forest vegetation and increased river access.

Response: On December 20, 2012, the Forest Service contacted this person to provide information and seek clarification on specific areas that the person may be concerned about (see Project Record).
The email noted that the proposed action (Alternative 2) utilizes the same ROW as the existing transmission line, which generally parallels US Hwy 191. Alternatives 3 and 4 involve some minor realignments to take the transmission line out of the middle of the Cascade Creek and Cave Creek recreation residence tracts. The Preferred Alternative (Alternative 3) would shift the line to the east of Cascade Creek tracts and US Hwy 191, across the highway from the Gallatin River. Alternative 3 also shifts the transmission alignment to the west of Cave Creek tracts, which is further away from the Gallatin River. Portions of this realignment would occupy an old ROW from a transmission line that existed in the 1950s. No new fishing access sites would be created. There would be a relatively small amount of timber clearing to widen the ROW to accommodate larger structures (14.8 acres for Alternative 2, 22.4 acres for Alternative 3, and 22.5 acres for Alternative 4). The person responded that they feel a lot better about this proposal and thanked the Forest Service for responding to their comments.

Comment 6	Approaches to MDT highways (US Hwy 191 and MT 64)
MDT	Noted that temporary approach permit will be necessary to use existing approaches onto MDT highways (US Hwy 191 and MT 64) and requested that a permit be completed for each approach that includes the design improvements and traffic control for construction work.

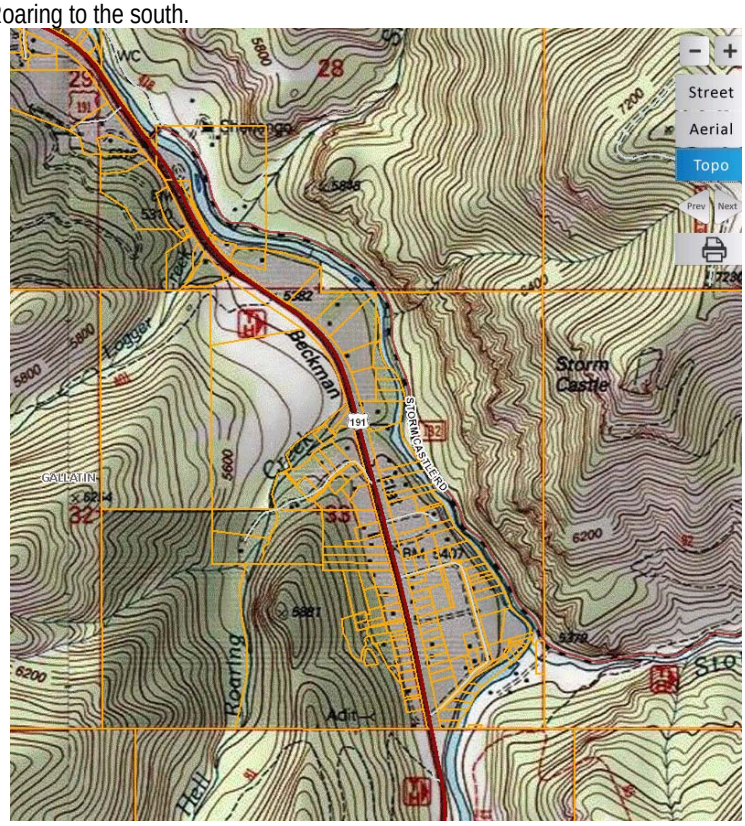
COMMENTER	COMMENT AND RESPONSE
Response: It is NorthWestern Energy's responsibility to comply with applicable MDT standards, and the FEIS notes that it is NorthWestern Energy's responsibility to obtain all applicable permits and approvals prior to construction. Table 1-2 notes that NorthWestern Energy would need a utility crossing and temporary approach permit from MDT (page 1-7).	
Comment 7	Cumulative Effects / Connected Actions
EPA	EPA noted that the summary in the DEIS (page iv) states that non-federal lands "are not part of the DEIS evaluation" since they are outside Forest Service jurisdiction. EPA noted that federal assessment of cumulative impacts and connected actions under NEPA can require consideration of the transmission line impacts on the portions of the transmission line crossing non-federal lands. 40 CFR 1508.25(a)(1). EPA noted that the DEIS did seem to analyze cumulative effects, but that it was unclear if all potential environmental effects of the entire 37 mile route across all land ownerships were adequately analyzed and disclosed, particularly indirect and cumulative effects. They requested that the FEIS include a map showing the entire 37 mile route, and also asked that information be provided pertaining to proposed temporary roads on the private portion of the 37 mile route. They also asked the Forest Service to consider guidance in a document titled 'Power to the People: Electric Transmission Siting on Public Lands.'
Response: Both the Draft and Final EIS consider direct, indirect, and cumulative effects. The Forest Service reviewed the document 'Power to the People: Electric Transmission Siting on Public Lands' and made changes in the FEIS to ensure the Forest Service considered in some detail the impacts associated with the entire transmission Project. Several updates were made to the cumulative effects analysis, including water resources, human health and safety, and transportation and traffic. In addition, the language in the summary was changed to state: "The Gallatin National Forest (GNF) is evaluating through this Final Environmental Impact Statement (FEIS) whether or not to authorize a project proposed by NorthWestern Energy (NorthWestern) to rebuild an existing 69 kilovolt (kV) electric transmission line to a 161 kV electric transmission line on National Forest System (NFS) lands. The upgraded 161 kV transmission line would connect the existing Jack Rabbit Substation located near Four Corners, west of Bozeman, Montana, to a new substation near Big Sky Meadow Village in Big Sky, Montana. The area affected by the proposal is located in the Gallatin River Canyon between Four Corners and Big Sky. The Gallatin Canyon is an important gateway for tourists visiting Yellowstone National Park and Big Sky. *The entire route is 37 miles, with 16 miles located on National Forest. Proposed rebuild and upgrade of the transmission line on private lands are not part of the decision being considered in this FEIS.* These 21 miles may be subject to Gallatin County permitting requirements (Four Corners Zoning District or Gallatin Canyon/Big Sky Zoning District).	
Comment 8	Temporary Roads
EPA	A. It is not clear if additional access roads may need to be constructed for the 21 miles of proposed transmission line across non-federal lands. Please include this information in the EIS. B. It is not clear if the proposed 600-foot access road at Indian Ridge Trail Head crosses Logger Creek. We recommend that the location of this access road be disclosed in the FEIS. If this road would cross any streams, it will be important to minimize stream impacts.

COMMENTER	COMMENT AND RESPONSE

Response:

A. NorthWestern Energy constructed approximately 13,000 feet (2.46 Miles) of temporary landings and roads on Phase I of the Jack Rabbit – Big Sky Project. All landings and roads are located on private lands, and consisted of plowing a landing or road to support line trucks, cranes and other equipment to dig and set poles, as well as access the structure for stringing purposes (i.e., connecting conductor to the insulators). All landings are around 20 feet wide near the base of a pole and all roads are about 12 feet wide. NorthWestern Energy indicated that all landings and roads will be reclaimed and restored to their existing condition except for the area of Dave Anderson (Section 9, T3S, R4E, along Shadoan Ditch Road between Cottontail Rd and Gateway Foothills Rd) in which the road will be left as is, but the area will be reseeded.

B. The proposed temporary road near Indian Ridge Trail Head does not cross any streams. Please refer to Appendix B, Figure 1, Map 01 of 14, which identifies the location of the proposed construction yard and temporary road. The road would be constructed across a meadow north of Hell Roaring Creek (Logger Creek is to the north of the Trail Head). In the map below, (excerpted from MT Cadastral), the temporary road would be located near the word Beckman. Logger Creek lies to the north of the Trail Head, and Hell Roaring to the south.



Comment 9 EPA	TMDLs / Impaired Waters There may be potential to affect surface waters, including 303d listed streams (Hell Roaring Creek, Storm Castle Creek, West Gallatin River, and South Fork West Gallatin River) (see Table 3.4.4-2, page 3.154). A TMDL and Water Quality Restoration Plan will need to be prepared by the State of Montana to promote water quality restoration of water quality impaired streams. It will be important that the proposed transmission line Project is consistent with MT DEQ's preparation of TMDLs and Water Quality Restoration Plans. Contact DEQ's TMDL program staff to assure that DEQ considers the proposed project to be consistent with these plans.

COMMENTER	COMMENT AND RESPONSE

Response: On January 3, 2013, the Forest Service contacted EPA to clarify that the Project should be consistent with the West Fork Gallatin River TMDL, which was completed in 2010. Information concerning this plan was provided in the Draft (page 3-157) and Final EIS. EPA concurred and further noted: "EPA is not going to further question the proposed Jack Rabbit to Big Sky Meadow Village 161 kV Transmission Line Upgrade Project in regard to potential transmission line impacts on 303(d) listed waterbodies, since the DEIS states that a stormwater MPDES permit will be obtained and a SWPPP will be prepared in association with construction of transmission line stream crossings. I do not anticipate water quality concerns, however, it is always good to have assurances from MDEQ TMDL staff that the proposed construction of transmission line crossings of 303(d) listed waterbodies (Hell Roaring Creek, Storm Castle Creek, WF Gallatin River, and the South Fork WF Gallatin River) will be consistent with applicable TMDLs, in case there are any interests with objections to the proposed Project (contact Robert Ray 444-5319 or Ann McCauley 444-9897 at MDEQ)." See project Record.

On January 3, 2013, the Forest Service contacted the MDEQ to ensure full coordination and consistency with the West Fork Gallatin River Watershed TMDLs and Framework Watershed Water Quality Improvement Plan (see Project Record). On January 4, 2012, the MDEQ responded that they concur with EPA's support for Alternative 3 and associated comments regarding potential impacts to water quality and wetlands from the proposed transmission line upgrade in Gallatin Canyon. They noted that Hell Roaring Creek is not on the 303(d) list for the Upper Gallatin TMDL planning area, but that Storm Castle (formerly Squaw Creek) is. The MDEQ noted that Storm Castle is listed for total phosphorus, yet the probable source was deemed "natural" and a TMDL was not completed for the stream. These corrections were made in the FEIS.

Comment 10	Wetlands
EPA	A. EPA appreciates the GNF's efforts to evaluate wetland resources and is pleased that the preferred alternative involves the fewest crossing of wetland areas (2.1 acres), and that riverine wetlands would be spanned in conjunction with spanning the Gallatin River, and all other wetlands would be spanned "to the extent practicable" (page 3-166). The DEIS acknowledges that some vegetation may need cutting or trimming for the larger ROW, but that the minimum amount of vegetation would be cut to reduce disturbance to wetland functions and values. EPA recommends that the placement of transmission line support structures be prohibited in wetlands, and that a wetland buffer zone be used to avoid inadvertent construction impacts to wetlands (e.g., 50-foot buffer zone). They also recommend that wetlands be flagged on the ground to facilitate contractor avoidance of wetlands and inadvertent impacts. B. Contact the US Army Corp of Engineers (USACE) to determine applicability of 404 permit requirements to proposed construction activities in or near streams and wetlands. C. Contact MDEQ in regard to MDEQ permits and authorizations. There is a joint application for various potential stream/wetland permits.

COMMENTER	COMMENT AND RESPONSE

Response:

A. EPA is correct in that Alternative 3 crosses the least amount of wetlands compared to other action alternatives (2.1 acres for Alternative 3, 2.7 for Alternative 2, and 2.8 for Alternative 4). Alternative 3 complies with Section 404(b)(1) guidelines to avoid impacts to wetlands.

The EIS notes that riverine wetlands would be spanned in conjunction with spanning of the Gallatin River, and that all other wetlands will be spanned *to the extent practicable*. Language was added to the wetlands analysis in Chapter 3.0 that wetlands will be spanned to the extent practicable, *and that wetland impacts will be minimized to the extent feasible by strategic pole placement*. Alternative 3 complies with Section 404(b)(1) guidelines to minimize impacts to wetlands.

However, it may not be practical or feasible to completely avoid the placement of transmission line support structures in wetlands and within a buffer area as EPA is suggesting. The EIS notes that five types of transmission structures may be used for the 161 kV transmission line, with the most common type being wooden transmission structures placed approximately 300 feet apart. In areas where a wooden transmission structure is infeasible, the EIS acknowledges that NorthWestern Energy may have to use guyed transmission structures, self-supporting steel transmission structures, wood laminate transmission structures, or two-pole H-frame structures. Pole placement and selection of the type of pole will be finalized during Project design, and there could be the potential that a pole would have to be placed in a wetland in order to shorten the span between poles, or use a pole type that is less visually impactive.

The EIS further notes that impacts to wetlands will be minor to due the ability to span wetlands, *direct embed (no additional excavation for foundation other than hole drilling) transmission structures in or near wetlands,* and use of wetland matting as needed to access transmission structure locations (DEIS, page 3-166).

It is NorthWestern Energy's responsibility to obtain applicable permits (such as Section 404 and 310 permits) for any unavoidable impacts to wetlands, and it is their responsibility to mitigate these impacts in accordance with applicable laws. A mitigation measure was added to the Project design/mitigation criteria to flag wetlands to avoid unintentional impacts.

B and C. The EIS notes that permits will be required from the USACE and MDEQ, and that NorthWestern Energy will be responsible for obtaining all permits and approvals required to implement the Proposed Project (page 1-6). It is NorthWestern Energy's responsibility to coordinate with the USACE and MDEQ on permitting requirements as they complete Project design.

Comment 11	Weeds
EPA	Herbicide drift into streams and wetlands can adversely affect aquatic life and wetland functions such as food chain support and habitat for wetland species. EPA recommends the following: A. Only certified herbicide applicators are used and that herbicides are used in accordance with label specifications. B. No herbicide spraying will occur in streams and wetlands or other aquatic areas (seeps, springs, etc). C. Use of a 50-foot no spray buffer zone along streams and wetlands for chemicals toxic to aquatic life, and mechanical weed removal or hand pulling of weeds adjacent to aquatic areas. Recommend flagging to avoid spraying these areas. D. Roadside drainage areas leading to intermittent and perennial streams should be flagged as no spray zones and not sprayed with picloram based herbicides. E. Apply herbicides at lowest rate effective in meeting weed control objectives and according to guidelines for protecting public health. F. Coordinate weed treatments with the forest botanist to assure protection to sensitive plants, and coordinate with fisheries and wildlife biologists to assure that sensitive fisheries and habitat are protected.

Response: NorthWestern Energy will be required to complete noxious weed control as a condition of approval of their Special Use Permit. The Gallatin National Forest previously considered the effects of weed treatment in their Noxious and Invasive Weed Treatment Project FEIS/ROD (USFS 2005). As such, EPA's recommendations were already considered, and have been incorporated into the Project. See EIS, pages 2-40-41 and Appendix C.

COMMENTER	COMMENT AND RESPONSE
Comment 12	Air Quality
EPA	EPA would like an analysis of potential air quality effects associated with transmission line construction and operation included in the FEIS. The analysis should disclose that no air quality non-attainment areas are located near the transmission alignment, and that a Class 1 Air Shed is located within 100 miles of the Project (Yellowstone Park). The analysis should discuss meteorological conditions in the Project area that may result in dispersion of construction related air pollutants, address the potential for air quality impacts from use of equipment and vehicles during construction, operation and maintenance (emissions of CO, CO_2, sulfur oxides, PM-2.5, NOx, VOCs, aldehydes, and polycyclic aromatic hydrocarbons), and creation of dust and particulates during construction. The FEIS should include BMPs to control fugitive dust during construction and incorporate other BMPs related to equipment emissions.
Response: An Air Quality analysis was added to the FEIS.	
Comment 13	Avian Mortality
EPA	The DEIS didn't mention any monitoring or surveys of potential bird mortality that may occur as a result of bird collisions to identify and detect bird mortality issues. Is any monitoring proposed? EPA recommends spring/fall field surveys during migratory periods and during spring nesting to locate birds that may have struck lines or been electrocuted to aid in the process of identifying and modifying problem areas. Such monitoring can help ensure that the transmission line is visible enough to avoid bird collision and mortality during long-term operation.
Response: Chapter 2 (PDF 5.8) notes that the Project would be developed consistent with the Avian Power Line Interaction Committee (APLIC) guidelines (2006) for avian safety, and would be operated under an Avian Protection Plan to reduce risk of collision and electrocution. NorthWestern Energy commented that their Avian Protection Plan contains industry standards that address this issue, and will provide a copy of this plan to the Forest Service prior to construction.	
Comment 14	Wildlife - Consultation with FWS
EPA	EPA recommends that the FEIS and ROD not be completed prior to completion of ESA consultation. If it is found that the selected action may adversely affect T/E species, the FEIS should include the associated Fish and Wildlife Service (FWS) BO or formal concurrence.
Response: On December 28, 2012, the Forest Service submitted a BA to the FWS to fulfill consultation requirements. On January 15, 2013, FWS concurred with the determinations in the BA that the proposed action is not likely to adversely affect the threatened grizzly bear (*Ursus arctos horribilis*), the threatened Canada lynx (*Lynx canadensis*), or designated Canada lynx critical habitat.	
Comment 15	Historic and Archaeological Resources
SHPO, EPA, NorthWestern	A. Section 106 consultation must be completed prior to decision. MT SHPO has not concurred with the proposed Area of Potential Effects. They have a concern regarding Forest Service plans to limit the Cultural Resources inventory to only Forest Service lands. (OR, SHPO). B. EPA anticipates that potential impacts on Tribal cultural properties, if any, will be identified and addressed during government to government consultation between the GNF and interested Tribes.
Response: A. On December 19, 2012, MT SHPO concurred with the Forest Service decision not to extend Section 106 review to private lands. The Jack Rabbit to Big Sky Meadow Village Transmission Line Upgrade cultural resource report by Power Engineers Inc., was provided to the Montana State Historic Preservation Office (MT SHPO) for review on February 11, 2013 pursuant to 36 CFR 800. The MT SHPO responded on February 25, 2013 and March 18, 2013, and agreed with the Forest Service determination of project effect. They recommended that National Register of Historic Places evaluations be completed as part of this project, which the Gallatin National Forest will pursue following release of the EIS and ROD. Therefore, state SHPO consultation requirements have been met. Please refer to SHPO-GNF correspondence in the project record. B. The Forest Service met with the Confederated Salish and Kootenai Tribes on April 17 and 18, 2012, and met with the Crow Tribe May 1st, 2012, and explained the Project to the Crow and Salish and Kootenai tribes person to person. The Forest Service also called the Nez Perce and the Northern Cheyenne. None of the Tribes had concerns with the Jack Rabbit to Big Sky Project.	
Comment 16	Environmental Justice
EPA	EPA did not see discussion or disclosure in the DEIS regarding the potential for disproportionate adverse impacts to minority or low-income populations from construction and operation of the proposed transmission line. While we would not anticipate disproportionate adverse impact to Environmental Justice populations, EPS recommends that the FEIS include some evaluation and disclosure regarding Environmental Justice considerations and compliance with EO 12898.
Response: An analysis of impacts to Environmental Justice populations was added to the FEIS.	

COMMENTER	COMMENT AND RESPONSE
Comment 17	Chapter 2
NorthWestern	A. Figure 2-3 should show width of H-frame structure. Figure 2-4 should show width of down guys. Figure 2-6 does not look like a laminated structure, the same as 2-2 single wood. B. Page 2-27, Helicopter Use, NorthWestern recommends the Forest Service and NorthWestern Energy schedule a meeting with FAA to discuss helicopter use. FAA is not listed in Chapter 4 under Consultation and Coordination. C. Page 2-27 Sequence of construction, NorthWestern request clarification on "work areas cleared as necessary." D. Several areas in the document describe pre-construction surveys. NorthWestern requests the Forest Service list in detail all preconstruction surveys required, the timing of the year the surveys need to be conducted and a comprehensive list of all construction timing restrictions. This would help identify the "timing restrictions" page 2-36, 4.7. E. Page 2-33, 2.2 NorthWestern recommends this type of written approval and notification to be part of the Construction Permit and not a separate activity. Page 2-36, 4.7. See comment for page 2-27, work areas cleared.
Response: A. Changes were made in the FEIS to note the dimensions of the structures. B. Page 2.27 noes that all helicopter operations would be coordinated with and approved by the Federal Aviation Administration (FAA). It is NorthWestern Energy to coordinate with FAA. C. NorthWestern asked for clarification on "work areas cleared as necessary." This refers to the ROW clearing that is described in the same section. A reference was added directing the reader to this section. D. The requirements for preconstruction surveys and timing restrictions were clarified in Chapter 2. E. Specific details regarding timber falling will be incorporated into the construction permit. The ROW clearing plan was updated and clarified in the FEIS.	
Comment 18	Chapter 3
NorthWestern	A. Wildlife: Page 3-292: NorthWestern recommends the elk preconstruction surveys on page 3-292 Project Design Features, Best Management Practices, Mitigation, and Monitoring and any other wildlife preconstruction surveys be eliminated. They feel the DEIS demonstrate the impacts to elk and other wildlife to be negligible, referenced, page 2-291, Cumulative Effects. B. Consultation and Coordination: NorthWestern recommends that consultation and coordination be started as soon as possible with the USACE, and the Federal Aviation Administration (FAA).
Response: The requirement for preconstruction surveys was dropped. It is NorthWestern Energy's responsibility to coordinate with the USACE and FAA, and obtain applicable permits prior to construction.	
Comment 19	Other Comments
NorthWestern	A. Appendix B Draft ROW Clearing Plan: page 25. There is no designated decking area between structures 15/60 and 15/61. This area was designated on previous maps and it will be needed for the clearing operations. This will eliminate many highway crossings with the helicopter logging operations and needs to be considered for public safety. NorthWestern has already negotiated with the adjacent property, the Castle Rock Baptist Church Camp for access to the forest boundary for removal of these logs after processing. B. NorthWestern would also propose leaving the distribution (two wire) line feeding the 35 mph sign near the Cascade Creek Cabins. This distribution would be the main feed into the cabin area and then the two long distribution crossings (north and south of the cabin area) that are currently on the 69 kV alignment could be removed with the 69 kV line. C. NorthWestern would also propose starting the Geo-tech work in areas that NorthWestern will be installing steel poles. To maintain our construction schedule, the Geo-tech work needs to start and can't wait for the ROD and NTP. NorthWestern recommends timber marking with ribbons to start as soon as possible to identify the scope of tree clearing activity. NorthWestern recommends the Forest Service inspector be identified, and associated time allocation and costs be projected. NorthWestern is in the process of renewing the existing SUP and has requested the Forest Service to renew the SUP regardless of what alternative is selected in this EIS process.

COMMENTER	COMMENT AND RESPONSE
Response:	
A. The Forest Service does not have any record for the request for a decking area between structures 15/60 and 15/61. In additional discussion with NorthWestern, it appears that NorthWestern originally thought this area was private. NorthWestern is currently assessing the need for this site, and the Forest Service is assessing available information.	
B. The Forest Service agrees with leaving the distribution wire to the 35 mph sign near Cascade Creek Cabins.	
C: The Forest Service notes these comments, and will be considering them through administration of the construction permit, rather than under this FEIS.	
Comment 22	Bighorn sheep
MFWP	The USFS included construction timing limits to prevent overlap with the lambing period, but MFWP would suggest clarification that over flights and construction disturbance would not happen from November 15 – May 31 on the portions of the line within wintering bighorn sheep habitat (areas by Deer Creek, often very near this powerline). Their wintering grounds are proximate the powerline as well. By mid-May, bighorn sheep may be lambing, but by May 30th, snowpack should have melted, allowing sheep to move upslope and away from the powerline.
Response: These timing restrictions have been incorporated into the Project design features in Chapter 2.0.	

Forest Service Project Manager
Gallatin National Forest
Re: Jack Rabbit to Big Sky Electrical
Transmission Line Project

To whom It May Concern:

I live in the Gallatin River Canyon @ 50' from the transmission line going to Big Sky. Does the proposed increase to a 161kv line create a health hazard to myself and others who live this close? If so does the route plan include moving the line so as not to present a hazard?

thanks,
Stephen Abbott
P.O. Box 6008
Bozeman, MT 59771

P.S. I have written to North Western Energy and am waiting a reply.

thanks again

From:	Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To:	Waring, Amy L -FS
Subject:	FW: NWE Comments - DEIS Jackrabbit to Meadow Village 161 kV Transmission Line
Date:	Tuesday, December 04, 2012 10:43:41 AM
Attachments:	DEIS-Final-Comments 12-3-12.docx

From: Asay, John P (Pat) [mailto:Pat.ASAY@northwestern.com]
Sent: Monday, December 03, 2012 3:46 PM
To: FS-comments-northern-gallatin
Cc: Stoeffler, Lisa -FS; Stewart, Eddy; Milodragovich, Sam; Riordan, Emmett O; Rhoads, William T
Subject: NWE Comments - DEIS Jackrabbit to Meadow Village 161 kV Transmission Line

Attached are NWE's comments. Thank you.

Patrick Asay
Manager of Lands and Permitting
NorthWestern Energy
40 East Broadway
Butte, MT 59701
406-497-3670 (O)
406-490-1862 (M)

12/3/12

NorthWestern Energy's Jackrabbit- Big Sky Meadow Village DEIS Comments

Page i, second paragraph first sentence change "Agency's preparation to the DEIS to the Agency's preparation to the Final Environmental Impact Statement (FEIS).

CHAPTER 1
Page 1-5, last paragraph. NWE is in the process of renewing the existing SUP and has requested the FS to renew the SUP regardless of what alternative is selected in this EIS process.

Chapter 2

Figure 2-3 should show width of H-Frame structure.

Figure 2-4 should show width of down guys.

Figure 2-6 does not look like a laminated structure, the same as 2-2 single wood.

Page 2-27, Helicopter Use, NWE recommends the Forest Service and NorthWestern Energy schedule a meeting with FAA to discuss helicopter use. FAA is not listed in Chapter 4 under Consultation and Coordination.

Page 2-27 Sequence of construction, NWE request clarification on "work areas cleared as necessary". Several areas in the document describes pre-construction surveys. NWE request the FS list in detail all preconstruction surveys required, the timing of the year the surveys need to be conducted and a comprehensive list of all construction timing restrictions. This would help identify the "timing restrictions" page 2-36, 4.7.

Page 2-33, 2.2 NWE recommends this type of written approval and notification to be part of the Construction Permit and not a separate activity.

Page 2,36, 4.7, See comment for page 2-27, work areas cleared.

Chapter 3

Page 3-87, Summary and Conclusion, NWE recommends the FS start development of the MOU or PA to address compliance of 106. We are concerned the delay in this process could delay the project schedule.

Page 3-148, A water resource table should be developed to identify all water resources to include river, perennial and intermittent streams, wetlands.
Page 3-169 Summary conclusion, NWE recommends consultation with the US Army Corps of Engineers begins immediately to identify Section 404 permitting requirements.

Wildlife

Page 3-292
NWE recommends the elk preconstruction surveys on page 3-292 Project Design Features, Best Management Practices, Mitigation, and Monitoring and any other wildlife preconstruction surveys be eliminated, we feel DEIS demonstrate the impacts to elk and other wildlife to be negligible, referenced, page 2-291, Cumulative Effects.

Consultation and Coordination
NEW recommends consultation and coordination is started as soon as possible with the US Army Corps of Engineers (COE), and the Federal Aviation Administration (FAA).

Other Comments
Appendix B Draft ROW Clearing Plan, page 25. There is no designated decking area between structures 15/60 and 15/61. This area was designated on previous maps and it will be needed for the clearing operations. This will eliminate many highway crossings with the helicopter logging operations and needs to be considered for public safety. NWE has already negotiated with the adjacent property, the Castle Rock Baptist Church Camp for access to the forest boundary for removal of these logs after processing.

NWE would also propose leaving the distribution (two wire) line feeding the 35MPH sign near the Cascade Creek Cabins. This distribution would be the main feed into the cabin area and then the two long distribution crossings (north and south of the cabin area) that are currently on the 69kV alignment could be removed with the 69kV line.

NWE would also propose starting the Geo-tech work in areas that we will be installing steel poles. To maintain our construction schedule, the Geo-tech work needs to start and can't wait for the ROD and NTP.

NWE recommends timber marking with ribbons to start as soon as possible to identify the scope of tree clearing activity.

NWE recommends the FS inspector be identified and associated time allocation and costs be projected.

From:	Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To:	Waring, Amy L -FS
Subject:	FW: Power line in Gallatin Canyon
Date:	Friday, November 30, 2012 11:06:42 AM
Importance:	High

-----Original Message-----
From: Jason Berry [mailto:jasonberry48@hotmail.com]
Sent: Sunday, November 11, 2012 9:56 PM
To: FS-comments-northern-gallatin
Subject: Power line in Gallatin Canyon
Importance: High

The new 161 kv power line in going through the canyon and due to our earily concerns and comments they are moving the line up the mountain and to the west (it will probably go over Wattlings outhouse).

What I need form you is a comment email letter to the Forest service as follows: and subject line "Jack Rabbit 161 KV transmission Line DEIS"

Gallatin National Forest, Bozeman Ranger District Attn:amy Waring, NEPATeam Leader
3170 Fallon St. Ste C
Bozeman, MT 59718

As a property owner on the Lone Mountain trail road I support having the new power line located higher up on the mountain side than the present line. The new line with larger poles, larger insulators and conductors will have a negative impact on the view from highway 191 to the lower village at Big Sky if it just replaces the present power line.

If the the new power line is rerouted higher up on the mountain side and on National Forest Lands it could tie into the new power substation and the existing power line which continues to the West along the mountain side.

Thank you,

Jason Berry
72 Garrison Loop
Ladera Ranch, CA 92694
949-375-2424

From: Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To: Waring, Amy L -FS
Subject: FW: Power line in Gallatin Canyon
Date: Friday, November 30, 2012 11:06:15 AM

-----Original Message-----
From: SHERRY BERRY [mailto:Jimberry14@cox.net]
Sent: Saturday, November 17, 2012 10:53 PM
To: FS-comments-northern-gallatin
Subject: Power line in Gallatin Canyon

> The new 161 kv power line in going through the canyon and due to our earily concerns and comments they are moving the line up the mountain and to the west (it will probably go over Wattlings outhouse).
>
> Subject line "Jack Rabbit 161 KV transmission Line DEIS"
>
> Gallatin National Forest, Bozeman Ranger District Attn:amy Waring,
> NEPATeam Leader
> 3170 Fallon St. Ste C
> Bozeman, MT 59718
>
> As a property owner on the Lone Mountain trail road I support having the new power line located higher up on the mountain side than the present line. The new line with larger poles, larger insulators and conductors will have a negative impact on the view from highway 191 to the lower village at Big Sky if it just replaces the present power line.
>
> If the the new power line is rerouted higher up on the mountain side and on National Forest Lands it could tie into the new power substation and the existing power line which continues to the West along the mountain side.
>
> Thank you,

Sherry Berry
25001 Castlewood
Lake Forest, CA 92630
949-951-5000

From: Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To: Waring, Amy L -FS
Subject: FW: Power Lines in Big Sky
Date: Friday, November 30, 2012 11:06:35 AM

-----Original Message-----
From: SHERRY BERRY [mailto:JIMBERRY14@COX.NET]
Sent: Wednesday, November 14, 2012 7:09 PM
To: FS-comments-northern-gallatin
Subject: Power Lines in Big Sky

Gallatin National Forest, Bozeman Ranger District
Attn: Amy Waring, NEPATeam Leader
3170 Fallon St., Ste. C
Bozeman, MT 59718

As a property owner on Lone Mountain Trail Road, I support having the new power line located higher up on the mountain side than the present line. The new line with larger poles, larger insulators and conductors will have a negative impact on the view from highway 191 to the lower village at Big Sky if it just replaces the present power line.

If the power line is rerouted higher up on the mountain side and on National Forest Lands it could tie into the new power substation and the existing power line which continues to the West along the mountain side.

Thank you,
Sherry & Jim Berry
980 Lone Mountain Trail
Big Sky, MT
949-951-5000
11/14/12

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

November 20, 2012

Gallatin National Forest
Bozeman Ranger District
Attn: Teri Seth, NEPA Team Leader
3170 Fallon Street, Ste. C
Bozeman, Montana 59718

Re: CEQ # 20120331, Jack Rabbit to Big Sky Meadow Village
161 kV Transmission Line Upgrade DEIS

Dear Ms. Seth:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Environmental Impact Statement (DEIS) for the Jack Rabbit to Big Sky Meadow Village 161 kV Transmission Line Upgrade Project, in accordance with EPA's responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321 *et.seq.*, and Section 309 of the Clean Air Act, 42 U.S.C., Section 7609. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major Federal agency action. EPA's comments include a rating of both the environmental impact of the proposed action and the adequacy of the NEPA document.

The EPA recognizes the purpose and need for the proposed construction and operation of the upgraded 161 kV Jack Rabbit to Big Sky Meadow Village transmission line to meet increasing load demands and improve electrical system reliability and geographical diversity of the electric service routes to the fast growing Big Sky, Montana area. We agree with the Gallatin National Forest's (GNF's) identification of Alternative 3 as the preferred alternative, since Alternative 3 involves the fewest acres of land disturbance (52.1 acres), fewest river and stream crossings, and fewest crossings of riparian and wetland habitat (2.1 acres of wetland habitat). Alternative 3 would also reduce scenery impacts to wilderness access at the Lava Lake trailhead, and reduce the number of recreational residences near the transmission line (40 residences within 300 feet of the transmission line vs. 57 residences currently).

Although we have some concerns that the preferred transmission line routing would cross the Gallatin River (a wild and scenic river candidate) 6 times, and have 14 other crossings of perennial streams (8 crossings on GNF lands and 6 crossings on private land), and 10 crossings of intermittent streams (7 crossings on GNF lands and 3 crossings on private land). There may be potential to affect surface waters, including some waters listed by the State of Montana as water quality impaired under Section 303(d) of the Clean Water Act (e.g., Hell Roaring Creek, Storm Castle Creek, West Gallatin River, South Fork West Gallatin River are located in the project area).

We are pleased that all waterbodies and associated floodplains and riparian vegetation would be spanned by the proposed transmission line, and that an NPDES (MPDES) permit would be obtained for construction stormwater discharges, which includes development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) prescribing engineering practices and BMPs to minimize sediment production and transport to streams. We also appreciate the identification and discussion of project design features and mitigation and monitoring measures in Chapter 2 of the DEIS, as well as the Appendices regarding Right-of-Way (ROW) Clearing, Weed Management, Reclamation, and Revegetation, and Best Management Practices (BMPs) that provide information on mitigation of potential adverse environmental impacts of the proposed project. In addition we appreciate the GNF's commitment to prepare a Construction, Operation, and Maintenance Plan (COM Plan) to address transmission line mitigation, design requirements and monitoring guidelines for the construction, operation, and maintenance of the line to avoid impacts to the environment, including appointment of an inspector to oversee construction and assure that environmental protection is carried out in accordance with the approved COM Plan.

We do encourage the GNF staff to contact the Montana Dept. of Environmental Quality's (MDEQ's) Total Maximum Daily Load (TMDL) program staff (e.g., Mr. Dean Yashan at 406-444-5317 and/or Mr. Robert Ray at 406-444-5319) to assure that MDEQ considers the proposed project to be consistent with MDEQ's development of TMDLs and Water Quality Restoration Plans for water quality impaired streams in the project area. We also encourage review of the MDEQ's pamphlet, ***"Understanding the Montana TMDL Process."*** http://deq.mt.gov/wqinfo/TMDL/default.mcpx .

In regard to access roads, the DEIS indicates that the proposed project involves construction of 600 feet of new temporary access road on GNF lands. Construction of access roads is an important aspect of transmission line projects, since road construction and road operation and maintenance can result in adverse effects to water quality and other resources. Sediment from roads, particularly during road construction and reconstruction, and from poorly maintained roads with inadequate road drainage, is often a major cause of adverse water quality impacts, particularly where roads are located near streams and there are many stream crossings. It is not clear if the proposed 600 foot access road on GNF lands would cross Logger Creek, which is in the vicinity of the Indian Ridge construction yard that the proposed road is intended to access. We recommend that this be clarified in the FEIS.

It is also not clear to us if the proposed 600 feet of new temporary road on GNF lands is the only access road needed for construction of the overall 37 mile transmission line across all land ownerships. Information should be provided regarding any additional access roads that may be needed for construction, operation and maintenance of the 21 miles of the proposed transmission line across non-federal lands. The DEIS Summary states that the 21 miles of the proposed project and associated substations on non-federal lands "are not part of the DEIS evaluation," since they are outside Forest Service jurisdiction. However, we note that when a proposed transmission line corridor is located on both federal and non-federal lands, federal assessment of cumulative impacts and connected actions under NEPA can require consideration of the transmission line impacts on the portions of the transmission line crossing non-federal lands (40 CFR 1508.25(a)(1)). It is important that the connected action of transmission line construction across non-federal lands be adequately analyzed and environmental effects disclosed in the NEPA analysis.

The DEIS does include analysis and disclosure of environmental effects of the entire 37 mile transmission line despite the statement noted above that the 21 miles of the proposed project and associated substations on non-federal lands "are not part of the DEIS evaluation." It is not clear to us, however, if all the potential environmental effects of the entire 37 mile transmission line across all land ownerships have been adequately analyzed and disclosed, particularly indirect and cumulative effects associated with the transmission line crossing of non-federal land. In our more detailed comments (see enclosed) we have referenced an analysis that discusses such considerations. We recommend that attention be directed at assuring that the indirect and cumulative effects of the entire 37 mile transmission line, including the 21 miles across non-federal lands, are adequately evaluated and disclosed in the FEIS. We also recommend that a map showing the entire 37 mile transmission line route be included in the FEIS (i.e., including the transmission line alignment across the 21 miles of non-federal land).

We also recommend that placement of transmission line support structures be prohibited in wetlands, and that a wetland buffer zone be used to avoid inadvertent construction impacts to wetlands (e.g., 50 foot wetland buffer zone). In addition we recommend that wetlands be flagged on the ground to facilitate contractor avoidance of wetlands. We also encourage use of single pole structures on the transmission line rather than H-frame structures wherever possible to reduce soil disturbances, although we recognize that H-frame structures may be needed in certain areas due to terrain, span length and for additional support.

The EPA's further discussion and more detailed questions, comments, and concerns regarding the analysis, documentation, or potential environmental impacts of the Jack Rabbit to Big Sky Meadow Village 161 kV Transmission Line Upgrade DEIS are included in the enclosure with this letter. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the DEIS has been rated as Category EC-2 (Environmental Concerns - Insufficient Information). Our environmental concerns are associated with potential impacts to water quality and wetlands during transmission line construction and operation, and uncertainty regarding overall indirect and cumulative impacts of the entire transmission line across all land ownerships. The EPA believes additional information is needed to fully assess and mitigate all potential impacts of the management actions. A copy of EPA's rating criteria is attached.

The EPA appreciates the opportunity to review and comment on the DEIS. If we may provide further explanation of our comments and concerns please contact Mr. Steve Potts of my staff in Missoula at 406-329-3313 or in Helena at (406) 457-5022, or via e-mail at potts.stephen@epa.gov . Thank you very much for your consideration.

Sincerely,

Julie A. DalSoglio

Julie A. DalSoglio
Director
Montana Office

Enclosures
cc: w/ enclosures
Suzanne Bohan/Judy Roos, 8EPR-N, Denver
Robert Ray/Dean Yashan, MDEQ, Helena

EPA COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE JACK RABBITT TO BIG SKY MEADOW VILLAGE 161 KV TRANSMISSION LINE UPGRADE

Brief Project Overview

The Bozeman Ranger District of the Gallatin National Forest prepared this EIS to evaluate impacts of a proposal by NorthWestern Energy to rebuild an existing 69 kilovolt (kV) electric transmission line to a 161 kV electric transmission line. The upgraded 161 kV transmission line would connect the existing Jack Rabbit Substation located near Four Corners, west of Bozeman, Montana, to a new substation near Big Sky Meadow Village in Big Sky, Montana to upgrade the existing 69 kV line to accommodate current requirements, anticipated future growth, and improve reliability for existing customers. The transmission line length is 37 miles with 16 miles across on National Forest land in the Gallatin Canyon. The US Forest Service developed three action alternatives, and the No Action (Alternative 1) in response to issues raised by the public and agency specialists. The three action alternatives include: Alternative 2 – Proposed Action; Alternative 3 – Agency Preferred Alternative (Cave Creek and Cascade East); and Alternative 4 (Cave Creek and Cascade West).

Alternative 2, the Proposed Action, would amend NorthWestern Energy's existing Special Use Permit (SUP) to authorize construction, operation, and maintenance of a 161 kV electrical transmission and distribution line on 16 miles of National Forest System (NFS) lands in Gallatin Canyon between the Jack Rabbit Substation near Four Corners, west of Bozeman, and the Meadow Village substation at Big Sky, Montana. The new transmission line would be constructed within 10 to 15 feet of the existing transmission line in the existing right-of-way (ROW), but tree and vegetation clearing would be required to increase the transmission line ROW from the current width of approximately 40 feet, to a 50- to 80-foot wide varying distance depending on the type of transmission structure used. From the Jack Rabbit Substation, the proposed route would proceed south through open pasture, rolling slopes, and residential areas (in the extreme north end) before crossing US Hwy 191 and entering the Gallatin River Canyon. The proposed route would then continue south following the existing alignment and US Hwy 191 for approximately 23 miles (16 miles through NFS lands) through the Gallatin River Canyon to the Big Sky turn-off at MT Hwy 64. From the Big Sky turnoff, the proposed route would then turn west, following the existing 69 kV line alignment for approximately 1.4 miles to the new Meadow Village Substation site. Approximately 600 feet of new temporary access road may be built to access Indian Ridge construction yard. Construction would be scheduled to begin in 2013 with the system coming on line, energized at the 161 kV level, during the fall of 2014. The existing transmission line would be removed after the new one is completed and materials disposed of off NFS lands. Construction waste will be disposed of off NFS lands. The 21 miles of the proposed Project and associated substations outside the US Forest Service jurisdiction are subject to Gallatin County permitting requirements (Four Corners Zoning District or Gallatin Canyon/Big Sky Zoning District).

Alternative 3, Cave Creek and Cascade East, the preferred alternative, was developed to respond to concerns about transmission line impacts to the Lava Lake Trailhead, the Lava Lake wilderness access trail, the Gallatin River (which is an eligible wild and scenic river) and impacts to the Cascade Creek and Cave Creek Tracts. The alternative would move the transmission line to the east side of US Hwy 191. Alternative 3 would utilize the same alignment as Alternative 2, with the exception of two local

routing options (LROs) that move the transmission line to the east side of US Hwy 191 and the Gallatin River, across from the Cascade recreation residences. It would eliminate one transmission line and one distribution line crossing each of the Gallatin River and US Hwy 191. Alternative 3 would also require two amendments of the Forest Plan: an amendment one for new ROW in Management Area 25 for electrical sransmission lines and pipelines, climatic and snowmeasuring sites, and electric sites; and an site-specific amendment relating to Forest Plan Wild and Scenic Rivers direction allowing new right-of-way in proximity to the Gallatin River

Alternative 4, Cave Creek and Cascade West, was developed to respond to the same issues described in Alternative 3, but provides a different solution in the Cascade Creek Tract vicinity. Alternative 4 would utilize the same route as Alternative 3 with the exception of the Cascade West LRO that would move the transmission line to the west of the recreation residences at the Cascade and Cave Creek Tracts, and would eliminate two Gallatin River crossings and two US Hwy 191 crossings, thereby reducing visual impacts that result from the crossings, and also result in the removal of a highly visible transmission pole in the Lava Lake trailhead parking lot. Alternative 4 would also require two Forest Plan amendments similar to Alternative 3.

Comments:

1. Thank you for including clear narrative descriptions of transmission line alternatives; project design features; mitigation and monitoring; alternatives considered but eliminated; a map identifying transmission line alignment options, topography, watersheds and surface waters to be crossed (Figure 2-1); Figures 2-2 to 2-7 showing transmission line structures, construction yards and decking areas along the alignments; Table 2-1 comparing project features and resource impacts of alternatives; Table 1-2, disclosing "Federal, State, And Local Permits, Approvals, and Authorizing Actions;" and many appendices with additional helpful project information. The narrative discussion, and other information presented in maps, figures, tables, and appendices facilitate improved project understanding, help define issues, and assist in evaluation of alternatives providing a clearer basis of choice among options for the decisionmaker and the public in accordance with the goals of NEPA.

   We also appreciate the commitment to prepare a specific Construction, Operation, and Maintenance Plan (COM Plan) to address transmission line mitigation and design requirements and monitoring guidelines for the construction, operation, and maintenance of the line to avoid inadvertent impacts to the environment (page 2-28). We understand this will include a Forest Service appointed inspector to oversee construction activities and determine if environmental protection is being accomplished according to the approved COM Plan.

Alternatives

2. The EPA recognizes the purpose and need for proposed construction and operation of the upgraded 161 kV transmission line to meet increasing load demands and improve electrical system reliability and geographical diversity of the electric service routes in the fast growing Big Sky, Montana area. We agree with the Gallatin National Forest's identification of Alternative 3 as the preferred alternative, since this alternative appears to involve the fewest acres of land disturbance (52.1 acres),

fewest river and stream crossings; and fewest crossings of riparian and wetland habitat (crossing of 2.1 acres of wetland habitat). Alternative 3 would also reduce scenery impacts to wilderness access at the Lava Lake trailhead; and reduce the number of recreational residences near the transmission line (40 residences within 300 feet of the transmission line vs. 57 residences currently). Although we also note that Alternative 3 involves greater timber clearing (22.4 acres) and effects to forest vegetation than Alternative 2 (14.8 acres). However, it appears that such impacts are necessary to move the transmission line away from residences and to reduce river and stream crossings.

3. We appreciate the consideration and discussion of an underground transmission line alternative for reduction of visual impacts in the "Alternatives Considered But Dismissed" section of DEIS Chapter 2 and in Appendix A. We agree that increased land disturbance, construction difficulties and high cost of construction on mountainous terrain, reduced reliability, and other considerations make an underground transmission line impractical.

4. We encourage use of single pole structures on the transmission line rather than H-frame structures wherever possible to reduce soil disturbances. We are pleased that the DEIS states that single wood pole structures are the preferred structure type, although H-frame structures may be used in areas identified during design that will require additional support due to terrain, span length and structure load (page 2-10).

Connected action

5. The proposed overall 37 mile transmission line involves construction across 16 miles of NFS lands and across 21 miles of other land ownerships (page 1-4). The DEIS states that the 21 miles of the proposed project and associated substations on non-federal land "are not part of the DEIS evaluation," since they are outside the Forest Service jurisdiction (Summary page iv). The DEIS further states that construction of the transmission line across the non-federal land ownerships are subject to Gallatin County permitting requirements (Four Corners Zoning District or Gallatin Canyon/Big Sky Zoning District (page 2-5).

   When a portion of a proposed transmission line corridor is located on non-federal lands, federal assessment of cumulative impacts and connected actions under NEPA can require consideration of the transmission line impacts on those non-federal portions (40 CFR 1508.25(a)(1)). This can complicate public land management decisions and addition of needed energy infrastructure. The DEIS appears to include analysis and disclosure of environmental effects of the entire 37 mile transmission line despite the statement in the DEIS summary noted above. Although it is not clear if all the potential environmental effects have been adequately analyzed and disclosed for the entire 37 mile transmission line across all land ownerships. It is important that the connected action of transmission line construction across non-federal lands be adequately analyzed and environmental effects disclosed, particularly indirect and cumulative effects. For your information we found a legal analysis discussing such considerations that we want to bring to your attention, http://www.bdlaw.com/assets/attachments/Power%20to%20the%20People%20-%20Electric%20Transmission%20Siting%20on%20Public%20Lands%20Schaumberg%20Wagner.pdf , ("Power To The People: Electric Transmission Siting On Public Lands").

We recommend that attention be directed at such matters to be sure the connected action of transmission line construction across non-federal lands is adequately analyzed and environmental effects disclosed in the NEPA analysis. We also recommend that a map showing the entire 37 mile transmission line route be included in the DEIS (i.e., including the route across the 21 miles of non-federal land from the Jack Rabbit Substation near Four Corners to the Gallatin National Forest boundary).

Water Resources

6. The DEIS states that approximately 3.4 miles of the proposed transmission line on NFS lands can be accessed from existing roads and trails, and would require no road work, while approximately 1.6 miles of the proposed 161 kV transmission line would require use of existing roads and trails and road improvements (page 2-22). Approximately 600 feet of new temporary access road would be built to access Indian Ridge construction yard, and 10.2 miles of the proposed 161 kV transmission line would have no access due to terrain or other obstacles. Helicopter and/or walk-in access would be needed during construction unless a crane can reach from an existing road. An additional 0.8 mile has an undetermined access prescription due to lack of engineering design information.

   It is not clear to us if any additional access roads may need to be constructed for the 21 miles of proposed transmission line across non-federal lands. If any additional access road construction may be needed for the portion of the proposed transmission line to be constructed on non-federal land that information should be included in the FEIS.

7. We are pleased that the proposed project involves construction of only 600 feet of new temporary access road on NFS lands. Construction of access roads is an important aspect of transmission line projects, since road construction and road operation and maintenance can result in adverse effects to water quality and other resources. Sediment from roads, particularly during road construction and reconstruction, and from poorly maintained roads with inadequate road drainage, is often a major cause of adverse water quality impacts, particularly where roads are near streams and there are many stream crossings. It is important to minimize new road construction, as well as to properly plan and design access roads, and properly maintain roads and utilize adequate sediment and erosion control BMPs during road construction to minimize erosion and reduce sediment production and transport from roads (i.e., locate roads away from steep slopes or erosive soils, stabilize cut and fill slopes; provide for adequate road drainage and erosion control measures, etc.).

   Logger Creek appears to be in the vicinity of the Indian Ridge construction yard that the proposed 600 foot temporary road is intended to access (Figure 2-7, page 2-25). It is not clear if this proposed temporary access road would cross Logger Creek. We recommend that the location of this access road be more clearly disclosed in the FEIS. If this road would cross any streams, it will be important that adequate attention be paid to minimizing stream impacts during construction and with appropriate road maintenance activities carried out while the road is in use.

8. The DEIS states that construction, operation, and maintenance of the proposed transmission line may cause erosion and increase sediment in storm water runoff to receiving waters causing increased turbidity and channel sedimentation (page 3-149). Impacts to water quality could also result from

accidental spills and leaks of petroleum, oil, and lubricants from equipment and vehicles used during construction of the transmission line. Figure 3.4.4-1 (page 3-143) shows watersheds and Table 3.4.4-2 (page 3-154) provides information on water quality impaired streams in the project area (i.e., Hell Roaring Creek, Storm Castle Creek, West Gallatin River, South Fork West Gallatin River).

A Total Maximum Daily Load (TMDL) and Water Quality Restoration Plan will need to be prepared by the State of Montana to promote water quality restoration of water quality impaired streams listed by the State under Section 303(d) of the Clean Water Act. It will be important that the proposed transmission line project be consistent with the Montana Dept. of Environmental Quality's (MDEQ's) preparation of TMDLs and Water Quality Restoration Plans for impaired waters. We recommend that the Gallatin NF consult with MDEQ TMDL program staff to assure that the MDEQ considers the proposed project consistent with development and implementation of applicable TMDLs and water quality improvement and restoration of support for beneficial uses in 303(d) listed streams (contact MDEQ staff such as Mr. Dean Yashan at 406-444-5317, and/or Mr. Robert Ray at 406-444-5319). We also encourage review of the MDEQ's pamphlet, ***"Understanding the Montana TMDL Process."*** http://deq.mt.gov/wqinfo/TMDL/default.mcpx .

9. The DEIS states that 36 waterbodies would be crossed on the proposed project by both NFS and private lands, with 27 waterbody crossings on NFS lands and 9 crossings on private land (page 3-158). This includes 8 crossings of the Gallatin River and 18 crossings of perennial tributary streams for a total of 26 perennial stream crossings (6 perennial streams are located on private lands), and 10 crossings of intermittent streams (7 on NFS lands and 3 on private lands). The preferred alternative would cross the Gallatin River 6 times and have 14 other crossings of perennial streams (8 crossings on NFS lands and 6 crossings on private land), and 10 crossings of intermittent streams (7 crossings on NFS lands and 3 crossings on private land). Table 3.4.4-3 (page 3-162) and Figure 3.4.4-2 (page 3-151) shows the number of water course crossings for each alternative, while Table 3.4.4-4 (pages 3-162) shows the acreage of highly erodible soils within 300 feet of a drainage for the alternatives (on NFS lands only).

   We are pleased that all waterbodies and associated floodplains and riparian vegetation would be spanned by the transmission line (page 3-158), and an NPDES (MPDES) permit would be obtained, which includes development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) prescribing engineering practices and BMPs to minimize sediment production and transport to streams (page 3-156). We are also pleased that the DEIS identifies project design features and mitigation and monitoring activities to protect water quality in Chapter 2 and Appendices C and D, and states that there would be no long term, negligible impact to water quality from the action alternatives (pages 3-158 to 3-160).

10. The EPA considers the protection, improvement, and restoration of riparian areas and wetlands to be a high priority. Wetlands and riparian areas increase landscape and species diversity, support many species of western wildlife, and are often critical to the protection of water quality and designated beneficial water uses. Potential impacts on riparian areas and wetlands include: water quality, habitat for aquatic and terrestrial life, flood storage, ground water recharge and discharge, sources of primary production, and recreation and aesthetics.

Executive Order 11990 requires that Federal Agencies *"take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities..."* and agencies are further directed to *"avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds (1) that there is no practicable alternative to such construction, and (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use..."*. In addition national wetlands policy has established an interim goal of **No Overall Net Loss of the Nation's remaining wetlands**, and a long-term goal of increasing quantity and quality of the Nation's wetlands resource base.

We appreciate the GNF's efforts to evaluate wetland resources in the project area (field review and evaluation of Montana Natural Heritage Program (MTNHP) wetland data). The DEIS states that 10 wetlands, one ephemeral drainage, and 14 streams were identified, and that 6 of the wetlands found had not been previously identified and were added to the GIS water resource database (page 3-164). Table 3.4.4-5 shows the acres of MTNHP and field identified wetlands in the transmission line ROW for the alternatives (page 3-166), and Figure 3.4.4-2 shows the water and wetlands in the analysis area as well as MTNHP and field identified wetlands in the ROW (page 3-151).

We are pleased that the preferred alternative involves the fewest crossings of wetland areas (2.1 acres), and that riverine wetlands would be spanned in conjunction with spanning of the Gallatin River, and all other wetlands would be spanned "to the extent practicable" (page 3-166). The DEIS indicates that some vegetation may need cutting or trimming for the larger 50-foot ROW to allow for required clearance for conductors, but the minimum amount of vegetation would be cut to reduce disturbance to wetland functions and values.

We recommend that placement of transmission line support structures be prohibited in wetlands, and that a wetland buffer zone be used to avoid inadvertent construction impacts to wetlands (e.g., 50 foot wetland buffer zone). We also recommend that wetlands be flagged on the ground to facilitate contractor avoidance of wetlands and inadvertent wetland impacts.

11. While the DEIS states that it is not expected that specific wetland fill or dredge permits would be required (page 3-166), and there would be no impact to wetlands for any of the alternatives from staging areas, fly yards, or deck areas (page 3-169), it also states that the U.S. Army Corps of Engineers (USACE) would be consulted to confirm jurisdictional status and wetland impacts avoidance (to the extent practicable). It further states that if wetland impacts cannot be avoided, the jurisdictional wetland delineations would be used to determine the need for a permit, and that temporary wetland matting would be used if wetlands need to be crossed by equipment to reduce impacts to vegetation, hydrology, and soils (page 3-169).

    We are pleased that the DEIS states that NorthWestern would comply with requirements of the CWA and other regulations and obtain and/or complete applicable permits and plans (page 3-165). and that additional jurisdictional wetland delineations would be conducted as needed for the affected wetland(s) to support permitting requirements (page 3-164). We encourage the GNF to contact Mr. Todd Tillinger of the U.S. Army Corps of Engineers, Montana Office in Helena at 406-441-1375 to determine applicability of 404 permit requirements to proposed construction activities

in or near streams or wetlands. The 404(b)(1) Guidelines (found at 40 CFR Part 230) provide the environmental criteria by which 404 permits are evaluated. See Corps of Engineers Montana Regulatory Office website for further information, http://www.nwo.usace.army.mil/Missions/RegulatoryProgram/Montana.aspx.

We also encourage contact with Mr. Jeff Ryan of the Montana DEQ at 406-444-4626 in regard to MDEQ permits and authorizations. A Montana Stream Permitting Guide is available to explain the various permitting authorities http://dnrc.mt.gov/permits/streampermitting/guide.asp. For your information to ease the administrative burden the Federal and State agencies have developed a single permit application for the various potential permits or authorizations that are often needed for construction near streams and wetlands (http://dnrc.mt.gov/permits/default.asp , http://dnrc.mt.gov/permits/streampermitting/joint_application.asp).

Soils

12. Transmission line construction on steep terrain and removal of vegetation during construction creates concerns regarding soil erosion. The DEIS indicates that the GNF Soil Survey does not provide sufficient detail or accuracy for management decisions at a project scale, although it provides some understanding of the general distribution of soils in the area (page 3-173). It states that there is potential for detrimental compaction due to loam and silt loam surface textures, and high potential for rutting in soils along the Gallatin River and some wet areas (page 3-188). The two soil units with the greatest potential for mass wasting are stated to be Unit 6E where underlying shale bedrock can cause landslide activity on steep slopes, and unit 9G where steep to extremely steep slopes are also prone to rockslides as evidenced by large scree slopes in the area.

    Table 3.4.5-7 (page 3-189) shows acreages of soil disturbance for the alternatives which evidences little variation in soil impacts among alternatives. All action alternatives would cause the same level of permanent soil disturbance (0.34 acre), with only slight variations in the amount of temporary disturbance caused. Alternative 2 would have the fewest acres of timber cleared (14.8 acres), while Alternative 4 would have the most acres of timber cleared (22.5 acres), closely followed by Alternative 3 (22.4 acres).

    We are pleased that the DEIS states that disturbed areas (with the exception of existing access roads) would be restored to their original contour and reseeded with Forest Service approved native seed mixtures where appropriate, and ripping and other surface scarification on existing construction roads or other areas would be done as needed (page 2-30). We expect that these measures along with other project design features, BMPs and reclamation activities and the COM Plan and inspection during construction would minimize soil impacts.

Noxious Weeds

13. As you know construction activities that involve soil disturbance create conditions favoring the spread of noxious weeds. We support use of noxious weed mitigation and control methods during transmission line construction, since many noxious weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. We are

pleased that a Draft Weed Management, Reclamation, and Revegetation Plan is included in Appendix C to limit and control weeds along the transmission line ROW, and that noxious weed effects are discussed in Chapter 3 of the DEIS (pages 3-193 to 3-211).

Weed prevention is the most cost-effective way to manage and control weeds by avoiding new infestations and spread of weeds, and thus, avoiding the need for subsequent weed treatments (e.g., weed prevention practices such as minimizing ground disturbance, revegetating disturbed areas, use of weed free seed, cleaning vehicles and equipment, and other practices that prevent infestation and spread of weeds). Early recognition and control of new weed infestations avoids wider future use of herbicides and other control methods. We also recommend use of gates on access roads to discourage ATV/recreational vehicle travel on roads, since such motorized uses add to soil disturbances and disperse weed seeds (although there will be only one 600 foot new temporary access road on NFS lands, but there are other existing roads that would be used).

We appreciate the identification of mitigation measures regarding herbicide use in the Draft Weed Management, Reclamation, and Revegetation Plan (Table 1, Appendix C). Herbicide drift into streams and wetlands can adversely affect aquatic life and wetland functions such as food chain support and habitat for wetland species. It is important that only certified herbicide applicators be used and that herbicides be used in accordance with label specifications. It should be unequivocally stated that no herbicide spraying will occur in streams and wetlands or other aquatic areas (seeps, springs, etc.). We recommend use of 50 foot no spray buffer zones along streams and wetlands for chemicals toxic to aquatic life (e.g., tordon/picloram), and mechanical weed removal or hand-pulling of weeds adjacent to aquatic areas. Hand-pulling can be effective for weeds that do not contain extensive root systems near surface waters. It may be helpful to add a list of those weed species which can be effectively hand-pulled (i.e. those without large tap roots and spreading rhizomatous root systems). The herbicide application technique of hand or manual wipe-on (especially applicable for contact systemic herbicides such as glyphosate) is an option to control individual weed plants up to the existing water level adjacent to streams or sensitive aquatic sites.

All efforts should be made to avoid movement or transport of herbicides into surface waters that could adversely affect public health, fisheries or other water uses. The Montana Water Quality Standards include a general narrative standard requiring surface waters to *be free from substances that create concentrations which are toxic or harmful to aquatic life*. Herbicide applicators should be advised of the potential for runoff of herbicides at toxic concentrations into the streams. The applicators should take precautions during spraying (e.g., applying herbicide only after careful review of weather reports to ensure minimal likelihood of rainfall within 24 hours of spraying; special precautions adjacent to the stream to reduce runoff potential; etc.). Streams and wetlands in any area to be sprayed be identified and flagged on the ground to assure that herbicide applicators are aware of the location of wetlands, and thus, can avoid spraying in or near wetlands. We are particularly concerned about potential use of more toxic and persistent herbicides such as picloram (Tordon), since they have higher potential for more serious stream and/or groundwater contamination. We recommend that roadside drainage areas leading to intermittent and perennial streams be flagged as no-spray zones and not sprayed with picloram based herbicides.

We also recommend that herbicides be applied at the lowest rate effective in meeting weed control objectives and according to guidelines for protecting public health and the environment. We recommend that picloram not be used at rates greater than 0.25 lbs/acre, and suggest that applications of persistent herbicides such as picloram only occur once per year.to reduce potential for accumulation in soil. Potential for persistant herbicides to accumulate in soil in harmful amounts are reduced if sites are treated only once per year (twice being the limit). Trade-offs between effective weed control and effects on soil productivity and leaching concerns may need to be considered. A second treatment application if needed should only occur after 30 days (or according to label directions).

We also recommend that herbicide weed treatments be coordinated with the Forest botanist to assure protection to sensitive plants, and coordinated with fisheries biologists and wildlife biologists to assure that sensitive fisheries and wildlife habitat areas are protected. Please also note that there may be additional pesticide use limitations that set forth geographically specific requirements for the protection of endangered or threatened species and their designated critical habitat. This information can be found at http://www.epa.gov/espp/bulletins.htm. You may also want to consider use of a more selective herbicide (clopyralid) in conifer associated communities to reduce impacts on non-target vegetation. We also note that spotted knapweed, which is a prevalent noxious weed species in Montana, is non-rhizomatous and should be relatively easy to control with lower rates of the more selective low toxicity herbicides.

For your information, the website for EPA information regarding pesticides and herbicides is http://www.epa.gov/pesticides/ . The National Pesticide Telecommunication Network (NPTN) website at http://nptn.orst.edu/tech.htm which operates under a cooperative agreement with EPA and Oregon State University and has a wealth of information on toxicity, mobility, environmental fate on pesticides that may be helpful (phone number 800-858-7378).

Electromagnetic Fields

14. As you know there can be public health concerns regarding electric fields created by a high-voltage transmission lines. Electromagnetic fields (EMF) effects can include induced currents, steady-state current shocks, spark discharge shocks, and in some cases field perception and neurobehavioral responses. We appreciate the analysis and discussion regarding potential human health and safety considerations in regard to the proposed project (pages 3-347 to 3-351). We are pleased that the DEIS analysis states that the proposed transmission lines would be constructed in accordance with industry and NorthWestern standards to minimize hazardous shocks from direct or indirect human contact with an overhead, energized line, and is expected to pose minimal hazards to humans (page 3-348).

The DEIS further states that the project would meet Montana Major Facility Siting Act requirements for minimal electric fields (i.e., an electric field at the edge of the ROW must not to exceed 1.0 kV/m measured one meter above the ground in residential or subdivided areas unless the affected landowner waives this condition; and the electric field at road crossings under the facility not exceed 7.0 kV/m measured at one meter above the ground [ARM 17.20.1607 "Linear Facilities, Minimum Impact Standard"]).

Air Quality

15. The DEIS indicates that Forest-Wide Standard 9 – Air Quality requires that the GNF cooperate with the Montana Air Quality Bureau and meet requirements in the State Implementation Plan and Montana Smoke Management Plan (page 3-226). However the DEIS did not include much analysis and discussion of potential air quality effects associated with transmission line construction and operation. It is likely that transmission line construction would include activities that could affect air quality during construction (short term), and during operation and maintenance of the transmission line (longer term). While we would not expect major air quality effects from construction and operation of a 37 mile transmission line, there may be potential for some air quality impacts from use of equipment and vehicles during construction, operation and maintenance (i.e., pollutant emissions of carbon monoxide, carbon dioxide, sulfur oxides, PM-2.5, nitrogen oxides, volatile organic hydrocarbons, aldehydes, and polycyclic aromatic hydrocarbons), and creation of fugitive dust and particulates during construction.

    We recommend that potential air quality impacts be discussed more fully in the FEIS. We also recommend that the FEIS include public disclosure that there are no air quality non-attainment areas located near the proposed transmission line alignments (http://deq.mt.gov/AirQuality/Planning/AirNonattainment.mcpx). In addition the FEIS should identify any nearby Federal/State air quality Class I areas located within 100 miles of the project area (i.e., Yellowstone National Park). It would also be of interest to discuss meteorological conditions in the project area that may result in dispersion of construction related air pollutants.

    Fugitive dust during construction should be controlled with dust control measures such as water sprays, limiting the speed of construction equipment, and reseeding the disturbed areas at the end of the construction period, and gaseous emissions limited through construction management and scheduling. We often recommend limiting diesel emissions by reduced idling and modern diesel engines and/or use of Ultra Low Sulfur Diesel in the construction equipment, and including rock crushing and other material production and processing that may be needed during construction of access roads in the efforts to minimize fugitive dust. For your information, we have identified below some mitigation measures to reduce air quality impacts during construction.

    - Requiring heavy construction equipment to use the cleanest available engines or to be retrofitted with diesel particulate control.

    - Requiring diesel retrofit of construction vehicle engines and equipment as appropriate.

    - Using alternatives for diesel engines and/or diesel fuels such as: biodiesel, LNG or CNG, fuel cells, and electric engines.

    - Installing engine pre-heater devices to eliminate unnecessary idling during winter time construction.

    - Prohibiting the tampering of equipment to increase horsepower or to defeat emission

control device's effectiveness.

- Requiring construction vehicle engines to be properly tuned and maintained.
- Using construction vehicles and equipment with the minimum practical engine size for the intended job.
- Using water or wetting agent to control dust.
- Using wind barriers and wind screens to prevent spreading of dust from the site.
- Having a wheel wash station and/or crushed stone apron at egress/ingress areas to prevent dirt being tracked onto public streets.
- Covering, as appropriate, all dump/haul trucks leaving sites.
- Covering or wetting temporary excavated materials.
- Using a binding agent for long-term excavated materials.
- Locating diesel engines as far away as possible from residential areas.
- Locating staging areas as far away as possible from residential uses.

Avian Mortality

16. The proposed transmission line will be located in a riverine area frequented by many bird species, and as you know transmission lines can result in avian mortality particularly due to bird collisions with the transmission line. We are pleased that the DEIS indicates that the transmission line would be constructed in accordance with the Avian Power Line Interaction Committee's (APLIC) guidelines (APLIC 2006) for avian safety and operated under and Avian Protection Plan to reduce risk of collision and electrocution (page 298). It also states that the increased diameter of the new 161 kV conductor under the action alternatives may result in increased visibility of the line, thus potentially allowing avian species more time to maneuver and avoid collision (paged 3-295).

    We did not see mention of any monitoring or surveys of potential bird mortality that may occur as a result of bird collisions with transmission line to identify and detect bird mortality issues that may occur. Is any avian mortality monitoring along the transmission line route proposed? We recommend that the field surveys be conducted during the spring and fall migratory periods and the spring nesting period to locate birds which may have been electrocuted or have struck transmission lines to aid in the process of identifying and modifying problem areas. Such monitoring can help ensure that the transmission line is visible enough to avoid bird collisions and avian mortality during long-term operation.

Other Wildlife Impacts

17. The DEIS indicates that transmission line construction, operation, and maintenance activities could impact wildlife species and their habitat, including the threatened Canada Lynx and Grizzly Bear. Table 3.4.9-3 (page 3-251) shows wildlife species potentially impacted by the proposed project. Potential wildlife impacts may include habitat loss; noise disturbance associated with human presence and construction equipment; and increased mortality (page 3-257).

    The DEIS states that Alternative 2 would impact the least amount of forest habitat (14.8 acres) and shrubland habitat (3.9 acres) that may provide cover, foraging, and linkage habitat for grizzly bears, with Alternative 3 impacting 22.4 acres of forested and 4.3 acres of shrubland habitat, and Alternative 4 impacting 22.5 acres of forested and 4.2 acres of shrubland habitat (page 3-268). The DEIS also states that action alternatives would meet all applicable direction for the threatened Canada Lynx. ROW expansion would affect minor amounts of boreal forest and lynx critical habitat (<= 2.2 acres and <= 20.1 acres respectively). There would be no impacts to existing lynx foraging or denning habitat, and indirect impacts to potential future denning/foraging habitat would be <= 2.2 acres. Project associated activities would be concentrated in the most highly developed area of affected LAUs. The proposed action would occur along the edge of two adjacent LAUs, so would not impact lynx habitat or connectivity within LAUs (page 3-283). Project design features and mitigation measures to reduce wildlife effects are included in Chapter 2 and BMPs in Appendix D.

    Section 7 Endangered Species Act (ESA) consultation with the US Fish and Wildlife Service (USFWS) appears to be ongoing (page 2-36). The DEIS states that mitigation measures developed during this consultation for impacts to threatened and endangered (T&E) species would be adhered to, and that preconstruction surveys for species protected under the Endangered Species Act would be conducted by qualified biologists to determine presence, absence, and habitat occupancy.

    We are pleased that the Forest Service is in ESA Section 7 consultation with the USFWS. We advise preparation of a Biological Assessment for the threatened Grizzly Bear and Canada Lynx, and submittal to the USFWS before a decision is made. We note that if it is found that the finally selected project alternative may adversely affect any T&E species the final EIS should include the associated USFWS Biological Opinion or formal concurrence for the following reasons:

    (a) NEPA requires public involvement and full disclosure of all issues upon which a decision is to be made;

    (b) The CEQ Regulations for Implementing the Procedural Provisions of NEPA strongly encourage the integration of NEPA requirements with other environmental review and consultation requirements so that all such procedures run concurrently rather than consecutively (40 CFR 1500.2(c) and 1502.25); and

    (c) The Endangered Species Act (ESA) consultation process can result in the identification of reasonable and prudent alternatives to preclude jeopardy, and mandated reasonable and prudent measures to reduce incidental take. These can affect project implementation.

Since the Biological Assessments and EIS must evaluate the potential impacts on listed species, they can jointly assist in analyzing the effectiveness of alternatives and mitigation measures. The EPA recommends that the final EIS and Record of Decision not be completed prior to the completion of ESA consultation. If the consultation process is treated as a separate process, the Agencies risk USFWS identification of additional significant impacts, new mitigation measures, or changes to the preferred alternative.

Historic and Archaeological Resources

18. The ROW for the proposed project for all action alternatives crosses several historic sites, including two recreation residences eligible for the National Register (page 3-84). Four known archaeological sites, assumed to be eligible to the National Register fall within the ROW and could also be impacted by ground-disturbing activities (page 3-85). The DEIS states that only nine percent of the study corridor has been surveyed for cultural resources, so it is possible that undiscovered historic or archaeological sites exist in the project area that could also be affected.

    We are pleased that Section 106 of the National Historic Preservation Act (NHPA) will be followed to address identification, evaluation, assessment of cultural effects, and implementation of measures to eliminate or reduce adverse effects (page 3-83), and that a Memorandum of Agreement (MOA) or Programmatic Agreement (PA) will be drafted between the Forest Service, Montana SHPO and other parties to address historic and archaeological effects of the transmission line. This MOA or PA will identify specific project design features that will be implemented to mitigate identified adverse impacts, how sites will be recorded, if archaeological monitoring is necessary, and how eligibility will be determined for archaeological sites and isolated finds and for historic buildings and structures

    We are also pleased that government-to-government Tribal consultation has been initiated by the GNF to identify issues of concern to Native Americans regarding the proposed project, including contacting the Confederated Salish and Kootenai Tribal Historic Preservation Office (THPO), Eastern Shoshone Tribe THPO, Crow Tribal Council, Crow Cultural Committee, Nez Perce Tribe, Shoshone-Bannock Business Council, and Wind River Shoshone Cultural Committee (page 3-54). We expect that potential impacts on Tribal cultural properties, if any, will be identified and addressed during government-to-government consultation between the GNF and interested Tribes.

Environmental Justice

19. Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires federal agencies to make environmental justice part of their missions by identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority populations (e.g. Native American) and low-income populations. We did not see discussion or disclosure in the DEIS regarding the potential for disproportionate adverse impacts to minority or low-income populations from construction and operation of the proposed transmission line.

    While we would not anticipate disproportionate adverse impacts to environmental justice populations, we recommend that the FEIS include some evaluation and disclosure regarding

environmental justice considerations and compliance with E.O. 12898 (see CEQ guidance at, http://ceq.hss.doe.gov/nepa/regs/ej/justice.pdf & EPA guidance at, http://www.epa.gov/compliance/resources/policies/nepa/enviro_justice_309review.pdf).

Roadless Areas

20. Roadless areas often provide population strongholds and key refugia for listed or proposed species and narrow endemic populations due to their more natural undisturbed character. EPA supports protection of the pristine character and integrity of remaining minimally disturbed roadless areas to prevent further fragmentation and degradation of wildlife habitat, and to maintain or restore solitude and primitive recreation characteristics in such areas.

    The DEIS indicates that the current 69 kV transmission line ROW and the proposed alternative ROWs pass through four segments of the Madison Inventoried Roadless Area (IRA), and the Gallatin Fringe IRA is within approximately 0.25 mile of the project, and there are a few areas of unroaded lands lay between the existing transmission line and the Madison IRA (page 3-131). Table 3.4.3-1 (page 3-137) shows transmission line ROW within roadless areas, with all action alternatives having identical effects, increasing ROW within the Madision IRA by 1.8 acres, due to the increase in ROW width by approximately 10 feet. The Gallatin Fringe IRA is not impacted by any alternative.

    We are pleased that the DEIS concludes that the action alternatives would have minimum additional impacts on roadless areas, and would not significantly further diminish the roadless character of the Madison IRA. The DEIS indicates that the existing US Hwy 191 and MT Hwy 64 and other human developments within or adjacent to this IRA have already diminished the roadless character of the area (page 3-140), and that most of this human development existed prior to the boundary of the Madison IRA being established.

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

Sara DurnamAnderson
3509 Ravalli, Bozeman MT 59718
406-587-3801
RE: Jack Rabbit 161kV Transmission Line DEIS

To Whom It May Concern:

As land owner in the Big Sky area, I have seen the growth and understand the need for an updated transmission line. A portion of the proposed project does cross our property located at approximately mile marker 54(Isabelle Drive). The current line runs on the east side of our property where there are several cabins. The existing line runs close to four of the cabins.

As part of the new transmission line, I would request that the line be moved further east off of our property and be totally on Forest Service owned land.

This would be beneficial to all parties and relieve some of the concerns of the possible health effects to the cabin occupants due to the higher capacity of the new transmission line.

Sincerely,

Sara DurnamAnderson

From: Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To: Waring, Amy L -FS
Subject: FW: Jackrabbit 161 KV Transmission Line DEIS
Date: Tuesday, December 04, 2012 10:44:06 AM

From: Jaden Erwin [mailto:jadenerwin@gmail.com]
Sent: Monday, December 03, 2012 10:31 AM
To: FS-comments-northern-gallatin
Subject: Jackrabbit 161 KV Transmission Line DEIS

Hello,
I am a cabin/property owner at 1275 Lone Peak Trail. The current power line outlines our property on two sides, the south side and the west side. The current power line runs through the viewing corridor to Lone Peak on our west side where it crosses the North Fork of the West Fork of the Gallatin. The addition o 161 KV Tranmission Line will not only ruin the viewing corridor to Lone Peak but will also most assuredly negatively affect our property value. I have sleepless nights worrying about this and am pleading for you to consider rerouting the power line to extend along Big Sky Spur Rd. and then cut across the North Fork of the West Fork of the Gallatin at a right angle to the new power sub station. This solution would move the transmission line from one of the two sides of the property line and open up the viewing corridor. I really appreciate your consideration on this as a new and larger 161 KV transmission line in the current location would effectively ruin my property that I have worked so hard maintain since 1970 when my father obtained it.
Sincerely,
Jaden Erwin

William H. Erwin

14 Clover View Dr.

Helena, Mt 59601

PH: 406-442-7704

Nov. 11, 2012

Gallatin National Forest, Bozeman Ranger District

Attn: Amy Waring, NEPA Team Leader

3170 Fallon St. Ste C

Bozeman, MT 59718

Subject: Jack Rabbit 161KV Transmission line DEIS

I am a property owner on the Lone Mountain Trail Rd. I am concerned that the larger, taller transmission towers and larger hardware and conductors will be a negatively impact the visual corridor from Hwy 191 along the Lone Mountain trail Rd. and view of Lone Mountain.

I suggest an alternate route located higher up on the South side of the mountain and on USFS land.

This higher reroute could tie in nicely with the new power substation and the power line going west which is located in trees and on the South side of the mountain and fairly well hidden from view.

From:	Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To:	Waring, Amy L -FS
Subject:	FW: Jack Rabbit 161K Transmission Line DEIS
Date:	Friday, November 30, 2012 11:05:40 AM

From: David Engstrom [mailto:engstrom@mail.sdsu.edu]
Sent: Monday, November 26, 2012 9:44 AM
To: FS-comments-northern-gallatin
Subject: Jack Rabbit 161K Transmission Line DEIS

To Whom It May Concern:

My family has a Forest Service cabin permit at Cave Creek. I support Alternative 3 because it reroutes the power line west of our cabins (up the mountain). I have been told by a relator that having a power line directly over my cabin reduces its property value, which I'd like to avoid. Moreover, the new power line might require taking down a very old and much revered Douglas Fir tree that we share with the two cabins directly above us. Finally, moving the power line up the mountain would mean that we are not exposed to the electromagnetic field and the noise or num associated with power lines.
Respectfully yours,

David W. Engstrom

602 E. Wake Forest St.
Brea, CA 92821-3644

November 2, 2012

c: Karen Barton, Secretary Treasurer
Cascade Creek Cabin Owners
810 S. Tracy Ave.
Bozeman, MT 59715

Tom Johnson, President
Cascade Creek Cabin Owners
411 Alderson
Bozeman, MT 59715

Gallatin National Forest
Bozeman Ranger District
attn: Amy Waring, NEPA Team Leader
3170 Fallon St. Ste C
Bozeman, MT 59718

Subject: "Jack Rabbit 161 KV Transmission Line DEIS"

The following reasons are why the NorthWestern Energy Power lines that run through Cascade Creek through U.S. Forest Service land should be relocated:

1) Several hundred trees will have to be cut down to widen the right away from the present 40 feet to 80 feet

2) The existing lines as well as the new lines that use the same right away are within 50 feet of 20 of the 23 cabins in Cascade Creek.

3) Several people who own cabins in Cascade Creek have come down with various types of Cancer that may have been caused by the close proximity of these power lines to their cabins.

4) If the new lines are routed along the same right away, the power company trucks and equipment used to set the new poles and lines are too heavy for the 3 bridges in Cascade Creek and will break them down. Who will pay for the repair of these bridges? The bridges have a current rating of 3 Tons (6000 lbs.).

Continued

5) The power company trucks heavy weight will tear up the roads and cause chuck holes. Who will pay for the road repairs?

6) There are numerous culverts (more than 10) that carry creek water under the roads to move the creek water in the various branches of the creeks to the river. Heavy trucks going over these buried culverts will crush and ruin them causing their replacement. Who will pay for their replacement and installation?

7) The new power poles and lines could be easily routed in a new right away parallel and east of U.S. 191 highway around Cascade Creek and not cause any of the above problems.

8) The trees that occasionally fall on these power lines, as they have in the past, cause wildfires, loss of personal property (cabins), loss of trees, and potential loss of human life. They also cause major power outages in Big Sky and the Gallatin Valley. The last one resulted in over 5000 homes without power in the Gallatin Valley according to power company representatives at the time.

9) These power lines (new and old) cause loss of beauty and aesthetics in the forest around Cascade Creek

Sincerely yours,

Edwin B. Flower

Margaret J. Flower

Cabin owners on lot 24

Montana Fish, Wildlife & Parks

Region Three
1400 South 19th
Bozeman, MT 5971

December 10, 2012

Gallatin National Forest
Bozeman Ranger District
ATTN: AMY WARING, NEPA TEAM LEADER
3710 Fallon Street, Suite C
Bozeman, MT 59718

Dear Ms. Waring;

Thank you for the opportunity to comment on the draft EIS for the Jack Rabbit to Big Sky Meadow Village 161kV Transmission Line Upgrade. The Gallatin Canyon along the Gallatin River is an important wildlife corridor, and many wildlife species cross the river and highway. In particular, the hillsides west of the Gallatin River between Burnt Creek and Highway 64 to Big Sky provide vital winter and spring habitat to elk, mule deer, and bighorn sheep.

We again recognize existing and clarified mitigations. The use of the existing route should avert the impacts of clearing a new route, and there should be minimal impacts to additional acreage. We also recognize that NorthWestern Energy has committed to restoration, revegetation, and weed control in all areas of soil disturbance. Weed control, as outlined in Appendix C and with a goal of "equal or reduced weed infestations within the Proposed Action area", is an especially important mitigation.

In this draft EIS, the USFS responded to our 7/2010 comments. The USFS adequately addressed our concerns about how new construction could affect raptor hunting perches and thereby bighorn sheep lamb mortality. The USFS did include construction timing limitations to prevent overlap with the lambing period, but MFWP would suggest clarification that overflights and construction disturbance would not happen from November 15-May 31 on the portions of the line within wintering bighorn sheep habitat (areas by Deer Creek and then along the Big Sky Spur Road). Bighorn sheep rut in late November, which is a key time for hunters to harvest the bighorn in Deer Creek, often very near this powerline. Their wintering grounds are proximate to the powerline as well. By mid-May, bighorn sheep may be lambing, but by May 30th, snowpack should have melted, allowing sheep to move upslope and away from the powerlines.

Our fisheries concerns are generic to this type of construction. Our main concern is to prevent localized stream disturbances during construction. The draft EIS states that no impacts to fisheries or water quality are anticipated, that at all stream crossings the stream zone would be avoided, and that no new roads will be built across creeks where existing roads are not already present. I anticipate that your construction plans will include actions to reduce or mitigate sediment delivery, and to prevent discharges of petroleum products or other harmful substances into nearby ditches, or to lands or paved surfaces capable of delivering these substances to nearby waterways.

Sincerely,

Patrick J. Flowers
Region 3 Supervisor

c: Mike Vaughn
Julie Cunningham

12/1/12

Gallatin National Forest, Bozeman, Ranger District

Attn: Amy Waring, NEPA Team Leader

3170 Fallon St. Ste C

Bozeman, Montana 59718

MS. Waring:

Re: Jack Rabbit 161 kv Transmission Line DIES

My wife and I are cabin owners in the Cascade Creek Homeowners association. We would like to say that we also fully support the Agency Preferred alternative # 3 (Cascade East) recommended in the N W Energy 161 kV upgrade Draft EIS, routing the line on the East side of the Gallatin River and Highway191 at lava Lake Trailhead and Cascade Creek Summer Homes recreational resident neighborhood. We also concur with the necessary amendments required to rerouting of the line from the existing right of way and update of the Gallatin National Forest Management Plan, specifically designating the new ROW corridor as management Area 25 and a site specific Forest Plan amendment to the forest-wide standard for Wild and Scenic Rivers. As many of our cabins now approach 100 years of age, we strongly believe the Cascade East alternative serves in the best interest of preserving the integrity, history and heritage of our area. You are to be commended for your study. It is both thorough in addressing an array of impacts together with being accurate in its outcomes.

Respectfully submitted,

Gary France Grace France

Gary & Grace France

Lot 2 Cascade Tracts

Gallatin National Forest, Bozeman Ranger District
Attn: Amy Waring NEPA team Leader
3170 Fallon St Ste C,
Bozeman MT 59718

In reference to the Jack Rabbit 161 kV transmission line DEIS.

The Cascade Creek cabins owner's association is strongly in favor of the agency-preferred alternative #3: routing the new transmission line to the east side of the river at Cave and Cascade Creeks. This alternative provides the best overall compromise in establishing a new, higher voltage, line to Big Sky. The Cave and Cascade Creek section of Gallatin Canyon is among the most scenic and highly used recreational areas in Gallatin National forest, including the Lava Lake trailhead, the mad mile white water rafting section of the Galitian River, heavily used fishing access points and the Cave and Cascade Creek residential cabin lease areas. The impact to all of these reconreational assets under options 2 or 4 would be wide ranging and affect thousands of recreational users each year; and the impacts would be long lasting and change the essential value and beauty of the Gallatin canyon.

The impact on the Cascade Creek residential cabin owners for option 2 or 4 would be much higher and more pervasive than outlined in the analysis. These cabins represent a historical chapter of Montana, many of them being close to 100 years old, built with logs harvested in the canyon and floated down Gallatin river to Cascade Creek. Many of these cabins were built by hand before there was electricity in the canyon or multi million dollar homes in Big Sky. These are rustic summer-use cabins, not changed much from the time they were built in the early 1900s. A large new power line would destroy the essence of what these cabins are and the value they provide to their owners. Option 2, the existing right of way, is not adjacent to these cabins; it goes through the middle of the community and the larger clearing necessary for the new line would take out dozens of old growth trees and completely change the aesthetic nature of several of the cabins.

We appreciate the forest service's work in reviewing multiple options for the route of the new power line and strongly support the agency's preferred route (route 3) on the east side of the river at Cave and Cascade Creek.

If you have questions or would like additional information, please feel free to contact me at (406) 581-9519 or tjkjan@bresnan.net.

Sincerely,

Thomas H. Johnson
President Cascade Creek Cabin Owners Association

From: Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To: Waring, Amy L -FS
Subject: FW: South Bridger Interface
Date: Friday, November 30, 2012 11:05:53 AM

-----Original Message-----
From: Celeste Haynes [mailto:celeste@digitalpath.net]
Sent: Saturday, November 24, 2012 1:59 PM
To: FS-comments-northern-gallatin
Subject: South Bridger Interface

Please keep me on your mailing list with updates on this project.

Gallatin/Bridger LLC
Celeste Haynes
423 Henshaw Ave.
Chico, CA95973

530-894-5813

From: Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To: Waring, Amy L -FS
Subject: FW: Jack Rabbit 161kv Transimision Line DEIS
Date: Friday, November 30, 2012 11:06:26 AM

From: Jim Owenhouse [mailto:jimowenhouse@msn.com]
Sent: Wednesday, November 14, 2012 7:41 PM
To: FS-comments-northern-gallatin
Subject: Jack Rabbit 161kv Transimision Line DEIS

Subject: Statement -- NW Energy 161kv Upgrad

• Statement: We fully support the Agency Preferred Alternative #3 (Cascade East) recommended in the NW Energy 161kV upgrade Draft EIS, routing the line on the East side of the Gallatin River and Highway 191 at the Lava Lake Trailhead and Cascade Creek Summer Homes recreational resident neighborhood. We also are in concurrence with the necessary amendments required to reroute the line from the existing right of way and update of the Gallatin National Forest Management Plan, specifically designating the new ROW corridor as Management Area 25 and a site specific Forest Plan amendment to the Forest-wide standard for Wild and Scenic Rivers. As many of our cabins now approach 100 years of age, we strongly believe the Cascade East alternative serves in the best interest or preserving the integrity, history and heritage of our area. You are to be commended for your study. It is both thorough in addressing an array of impacts and accurate in its outcomes.
Thank You,

Ella May & Jim Owenhouse / Mary Ann & Bob Noack (Cascade Creek Summer Homes)
2122 Fairway Dr. 2100 Crest Dr.
Bozeman, MT, 59715 Lake Oswego, OR. 97034
406-587-1432 503-805-4343
jimowenhouse@msn.com maryannoack@msn.com

From: Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To: Waring, Amy L -FS
Subject: FW: Jack Rabbit 161 KV Transmission Line DEIS
Date: Friday, November 30, 2012 11:06:52 AM

From: Peter & Nancy [mailto:norlander@q.com]
Sent: Saturday, October 20, 2012 2:54 PM
To: FS-comments-northern-gallatin
Subject: Jack Rabbit 161 KV Transmission Line DEIS

I am writing to comment on the proposed 161 KV Transmission Line through the Gallatin River Canyon on Gallatin National Forest Property.

1. I am writing as a Private Citizen who formerly resided in the Gallatin Canyon at 63810 Gallatin Road.
2. My name is Peter Norlander, 530 N. Main, Livingston MT 59047; 406-222-4646; norlander@q.com . I am also a Board Member on both Sacajawea Audubon Board of Directors as well as a permanent member of Montana Audubon Board of Directors.
3. I am writing that I **positively in favor** of NorthWestern Energy Inc.s proposal to upgrade their current transmission 69KV line to a 161KV line on Gallatin NFs property in the Gallatin River Canyon.

Thank you for letting me comment.
Peter Norlander
.

Big Sky. Big Land. Big History.
Montana
Historical Society

Historic Preservation
Museum
Outreach & Interpretation
Publications
Research Center

November 9, 2012

USDA Forest Service
Gallatin National Forest
Bozeman Ranger District
Attn: Amy Waring, NEPA Team Leader
3710 Fallon Street Ste C
Bozeman, Montana 59718

RE: Jack Rabbit 161 kV Transmission Line Draft Environmental Impact Statement

To Whom It May Concern:

Thank you for the invitation (received October 18, 2012) to comment on the Draft Environmental Impact Statement (DEIS) for the proposal to rebuild and upgrade the existing 69 kilovolt (kV) electrical transmission line that runs from the Jack Rabbit substation west of Bozeman, Montana, to a new substation near Big Sky Meadow Village in Big Sky, Montana. Based on the provided information, the Montana State Historic Preservation Office (Montana SHPO) has several concerns:

The DEIS briefly acknowledges (page 3-365) that the lead Federal agency must complete the Section 106 process prior to the approval or issuance of any permit or license. However, the Montana SHPO would like to stress the importance of completing all Section 106 review and compliance before issuing a formal record of decision. This ensures that other alternatives are available when determining the most appropriate minimization, avoidance and mitigation strategies.

Furthermore, according to our records, the Montana SHPO did not receive the January 4, 2012 letter requesting consultation for the Jack Rabbit to Big Sky Project. Therefore, the Montana SHPO has not formally concurred with the proposed the Area of Potential Effects (APE). One of our primary concerns regarding the APE is whether the USFS Gallatin National Forest plans to limit the Cultural Resource Inventory to only USFS land. If this is the case, before the Montana SHPO is able to concur with the proposed APE, we need to receive a detailed and clear explanation regarding the decision not to conduct a Cultural Resource Inventory beyond the Gallatin National Forest boundaries.

If you have any questions or concerns, please do not hesitate to contact me directly at (406) 444-0388 or kore@mt.gov. Thank you for consulting with us.

Sincerely,

Kathryn Ore
Review and Compliance Officer
Montana State Historic Preservation Office

225 North Roberts Street
P.O. Box 201201
Helena, MT 59620-1201
(406) 444-2694
(406) 444-2696 FAX
montanahistoricalsociety.org

File: USFS/Gallatin – 2012 – 2012101905

From: Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To: Waring, Amy L -FS
Subject: FW: Jack Rabbit 161kv Transimision Line DEIS
Date: Friday, November 30, 2012 11:06:26 AM

From: Jim Owenhouse [mailto:jimowenhouse@msn.com]
Sent: Wednesday, November 14, 2012 7:41 PM
To: FS-comments-northern-gallatin
Subject: Jack Rabbit 161kv Transimision Line DEIS

Subject: Statement -- NW Energy 161kv Upgrad

• Statement: We fully support the Agency Preferred Alternative #3 (Cascade East) recommended in the NW Energy 161kV upgrade Draft EIS, routing the line on the East side of the Gallatin River and Highway 191 at the Lava Lake Trailhead and Cascade Creek Summer Homes recreational resident neighborhood. We also are in concurrence with the necessary amendments required to reroute the line from the existing right of way and update of the Gallatin National Forest Management Plan, specifically designating the new ROW corridor as Management Area 25 and a site specific Forest Plan amendment to the Forest-wide standard for Wild and Scenic Rivers. As many of our cabins now approach 100 years of age, we strongly believe the Cascade East alternative serves in the best interest or preserving the integrity, history and heritage of our area. You are to be commended for your study. It is both thorough in addressing an array of impacts and accurate in its outcomes.
Thank You,

Ella May & Jim Owenhouse / Mary Ann & Bob Noack (Cascade Creek Summer Homes)
2122 Fairway Dr. 2100 Crest Dr.
Bozeman, MT, 59715 Lake Oswego, OR. 97034
406-587-1432 503-805-4343
jimowenhouse@msn.com maryannoack@msn.com

From: Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To: Waring, Amy L -FS
Subject: FW: Jack Rabbit 161 kV Transmission Line DEIS
Date: Friday, November 30, 2012 11:05:32 AM
Attachments: Jack Rabbit 161 kV Transmission Line DEIS.pdf

-----Original Message-----
From: Timothy H. Pinson [mailto:thpinson@mac.com]
Sent: Tuesday, November 27, 2012 9:15 AM
To: FS-comments-northern-gallatin
Cc: Helen Pinson; Timothy H. Pinson
Subject: Jack Rabbit 161 kV Transmission Line DEIS

Please find comments on the subject matter in the attached document.

November 27, 2012

Gallatin National Forest, Bozeman Ranger District
Attn: Amy Waring, NEPA Team Leader
3170 Fallon St. Ste C,
Bozeman, Montana 59718

Subject: Jack Rabbit 161 kV Transmission Line DEIS

Dear Ms. Waring,

We fully support the Agency Preferred Alternative #3 (Cascade East) recommended in the NW Energy 161kV upgrade Draft EIS, routing the line on the East side of the Gallatin River and Highway 191 at the Lava Lake Trailhead and Cascade Creek Summer Homes recreational resident neighborhood. We also are in concurrence with the necessary amendments required to reroute the line from the existing right of way and update of the Gallatin National Forest Management Plan, specifically designating the new ROW corridor as Management Area 25 and a site specific Forest Plan amendment to the Forest-wide standard for Wild and Scenic Rivers. As many of our cabins now approach 100 years of age, we strongly believe the Cascade East alternative serves in the best interest or preserving the integrity, history and heritage of our area. You are to be commended for your study. It is both thorough in addressing an array of impacts and accurate in its outcomes.

Very Truly Yours,

Timothy H. Pinson
Helen K. Pinson
665 Cascade Creek Road
P. O. Box 70
Gallatin Gateway, Montana 59730
303-798-9970 (Winter / Spring months)
406-995-4757 (Summer / Fall months)
thpinson@mac.com

From: Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To: Waring, Amy L -FS
Subject: FW: Jack Rabbit 161 kV Transmission Line DEIS - MDT Comments
Date: Friday, November 30, 2012 11:06:02 AM
Attachments: Document.pdf

-----Original Message-----
From: Riley, Jean [mailto:jriley@mt.gov]
Sent: Tuesday, November 20, 2012 7:29 AM
To: FS-comments-northern-gallatin
Subject: Jack Rabbit 161 kV Transmission Line DEIS - MDT Comments

Please find Montana Department of Transportation (MDT) comments on the Draft EIS for the Jack Rabbit 161 kV Transmission Line. A hard copy has been put in the mail.

Jean A. Riley, P.E. - Transportation Planning Engineer Policy, Program & Performance Analysis Bureau
Montana Department of Transportation
(406) 444-9456

MDT Montana Department of Transportation
2701 Prospect Avenue
PO Box 201001
Helena MT 59620-1001

Mike Tooley, Director
Brian Schweitzer, Governor

September 10, 2010

Teri Seth
Gallatin National Forest
NEW Transmission Line Project
3710 Fallon St., Ste C.
Bozeman MT 59730

Subject: Jack Rabbit to Big Sky Meadow Village 161 kV Transmission Line Upgrade Project
MDT initial comments on NOI

Dear Teri,

The Montana Department of Transportation (MDT) staff has reviewed the Notice of Intent (NOI) for the above referenced project. Some of this project is adjacent to or encroaches within MDT right-of-way. MDT requires permit any utilities that encroach within the MDT right-of-way.

MDT staff wants to continue to be involved in the design and development process. This will allow MDT staff to make recommendations concerning the placement of the transmission line to prevent or lessen impacts to the traveling public. The following information must be completed and approved prior to working within the MDT right-of-way.

- The Utility must complete a Utility Occupancy and Location Agreement and Environmental Checklist.
- The Utility must submit a set of plans for the work within MDT right-of-way. MDT staff will review the plans and if appropriate approve the installation request. The review may take multiple iterations.
- The Utility's contractor must supply a traffic control plan for any work within MDT right-of-way. The plan must be reviewed and approved prior to start of work.
- There are other utilities along MDT roadways and within MDT right-of-way, the Utility must coordinate with Rob Bukvich concerning the existing permitted utility locations.
- MDT staff will inspect the completed construction to confirm all impacts to MDT facilities have been repaired to MDT's satisfaction.
- The Utility is responsible for all environmental permits.
- All regulatory permits and/or authorizations must be obtained prior to initiation of work within MDT right-of-way.

I have attached a copy of the present MDT projects scheduled or anticipated within the area for your reference. Be advised this list may be modified or additional MDT projects may be added during the course of the Utility's project development.

If you have any questions concerning these comments or requirements, please contact me at jriley@mt.gov or (406) 444-9456.

Sincerely,

Jean A. Riley, P.E.
Transportation Planning Engineer
Planning & Policy Analysis Bureau

Attachment:

Copies: Jeff Ebert, P.E. – Butte District Administrator
Ray Stocks – Bozeman Maintenance Chief
Rob Bukvich – Bozeman Utility Agent
Walt Scott – Right-of-Way Utility Section
Jim Skinner – Planning & Policy Analysis Bureau
File

MDT PROJECT STATUS
GALLATIN CANYON and JACKRABBIT LANE
Updated January 26, 2010

Projects in Construction Phase:

- **Slope Flattening/Widening-Gallatin Canyon; NH-HSIP 50-1(17)32; CN 2544001**
- **Erosion Protection- Gallatin Canyon; NH 50-2(53)57; CN 5103**
- **North Gallatin Canyon; NH 50-2(65)65; CN 6804**
- **Huffine Lane- Four Corners to 19th; STPP 50-2(63)82; CN 6810**

Planned (Future) Projects:

- **North Gallatin Canyon-Four Corners; NH 50-2(67)70; CN6805**
- **Turn Lanes-Gallatin Canyon; NH 50-1(28)42; CN 2544002**
- **2001- Grayling Creek- N of US 20; HSIP 50-1(24)10; CN 5026**
- **Cougar Creek- 7 Miles North of West Yellowstone; BR 50-1(32)8; CN 6852**
- **Four Corners-North; NH-HSIP 85-1(10)0; CN 4306001**
- **Belgrade-South; NH-HSIP 85-1(16)3; CN 4306002**
- **JCT MT 85- East (West Section); STPS 235-1(9)0; CN 4470**
- **Amsterdam Road-Thorpe to Jackrabbit Lane; UPP 0602(86); CN 6980000**

Projects in Construction Phase: (either contract awarded or construction actually started) Listed in chronological order by Award Date

Slope Flattening/Widening-Gallatin Canyon; NH-HSIP 50-1(17)32; CN 2544001
Project awarded on May 5, 2008 to COP Construction LLC
Various Locations along US Highway 191 as follows:

Mile Marker	Location Description	Work Description
45.0 to 46.6	Big Sky Area	Reconstruction/widening of roadway to include a Two-Way Left Turn Lane.
46.6 to 48.4	Big Sky Area	Reconstruction of the West Fork of the Gallatin bridge including turn lanes.
49.6 to 49.8	Jack Smith Bridge Area	Slope Flattening
57.3	Swan Creek Area	Reconstruction of the Swan Creek bridge including a Left Turn Lane/
67.9 to 68.1	Spanish Creek Area	Correct Superelevations.

Construction will be completed during the 2010 construction season.

Erosion Protection- Gallatin Canyon; NH 50-2(53)57; CN 5103
Project awarded on May 5, 2008 to COP Construction LLC
Two locations along US Highway 191 at Mile Markers 59.1 and 61.2. Both sites consist of construction of slope stabilization features between US Highway 191 and the Gallatin River, and installation of guardrail. Work will be substantially complete in 2009.

North Gallatin Canyon; NH 50-2(65)65; CN 6804
Project awarded on September 22, 2009 to Knife River-Belgrade

Pavement Preservation project along 5 miles of US 191 consisting of Seal & Cover, and pavement markings from Mile Marker 65.2 to Mile Marker 70.2. Project will be completed or substantially completed by the end of the 2010 construction season.

Huffine Lane- Four Corners to 19th; STPP 50-2(63)82; CN 6810
Project awarded on September 22, 2009 to Knife River-Belgrade
Pavement Preservation project along 6.1 miles of Huffine Lane (US Highway 191) consisting of Milling and Filling the four travel lanes from Four Corners (Mile Marker 81.9) to Fowler Road (≈ Mile Marker 87.0) followed by Seal & Cover and pavement markings the entire project from Four Corners to 19th Avenue (Mile Marker 88.0). Project will be completed or substantially completed by the end of the 2010 construction season.

Planned (Future) Projects: Listed by route

Construction of the planned projects depicted in this list are dependent upon completion of design and availability of funding. What is represented in this list is a snapshot of the current MDT program for this area.

North Gallatin Canyon-Four Corners; NH 50-2(67)70; CN6805
Pavement Preservation project along 11.4 miles of US Highway 191 beginning just south of the Gallatin River Bridge, Mile Marker 70.2, and ending just south of Four Corners, Mile Marker 81.6, consisting of mill & fill, seal & cover, and pavement markings. Project will be completed or substantially completed by the end of one construction season when let to contract.

Turn Lanes-Gallatin Canyon; NH 50-1(28)42; CN 2544002
Various Locations along US Highway 191 as follows:

Mile Marker	Location Description	Work Description
41.5	Red Cliff Campground Area	Construction of a Left Turn Lane.
55.3	Karst Ranch Area	Construction of a Left Turn Lane.
56.2	Moose Creek Area	Construction of a Left Turn Lane.
58.3	Greek Creek Area	Construction of a Two-way Left Turn Lane
64.9 to 66.0	Squaw Creek & Castle Rock Inn Area	Slope Flattening

Project will be completed or substantially completed by the end of one construction season when let to contract.

2001- Grayling Creek- N of US 20; HSIP 50-1(24)10; CN 5026
Reconstruction of approximately one mile of roadway including the bridge crossing at Grayling Creek from Mile Marker 9.5 to Mile Marker 10.5, (US Highway 191). Alternate alignments are under consideration. Project will be completed or substantially completed by the end of one construction season when let to contract.

Cougar Creek- 7 Miles North of West Yellowstone; BR 50-1(32)8; CN 6852

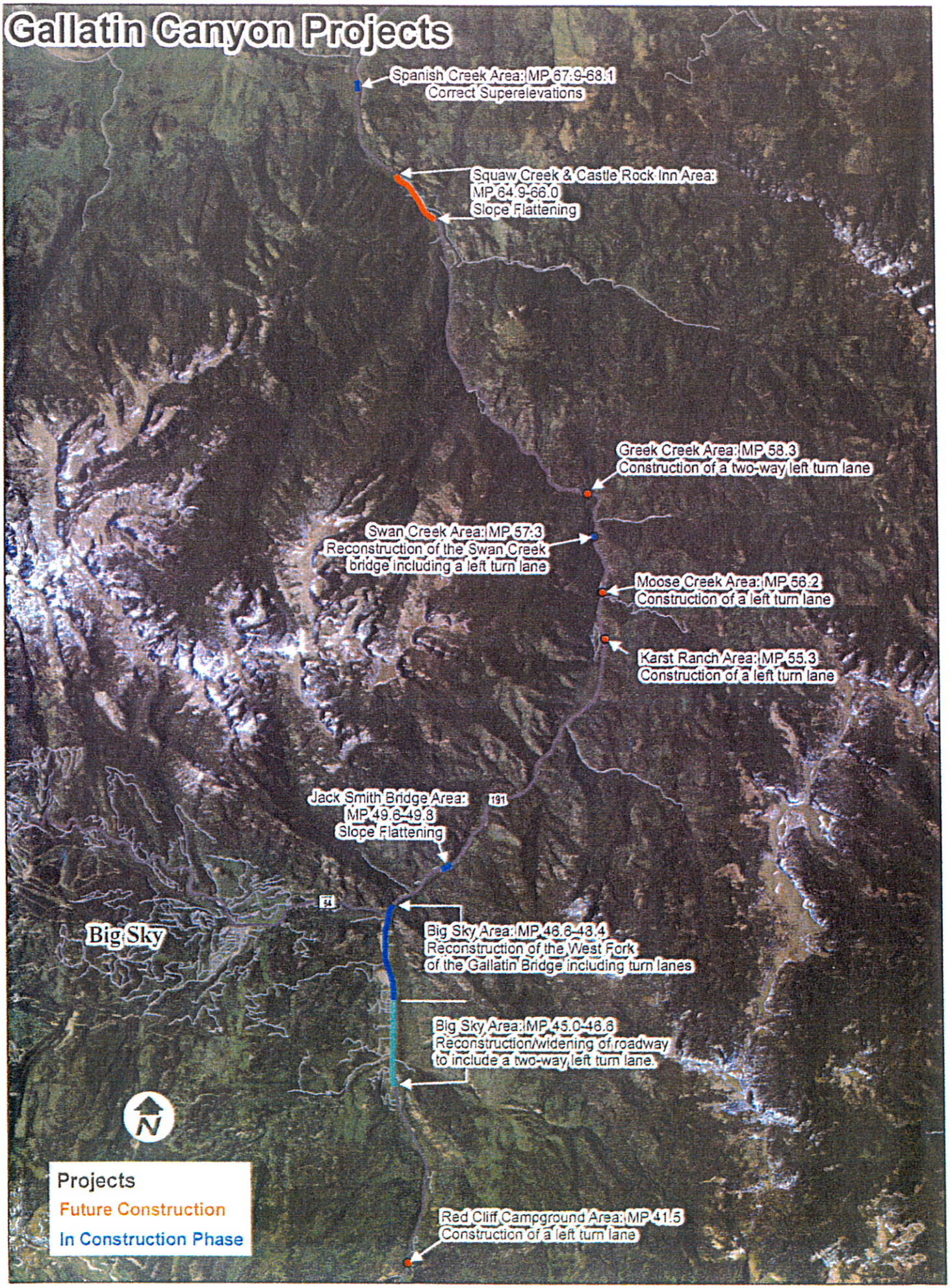
Scour Mitigation project associated with Cougar Creek on US Highway 191, Mile Marker 7.5, north of West Yellowstone. Project will be completed or substantially completed by the end of one construction season when let to contract.

Four Corners-North; NH-HSIP 85-1(10)0; CN 4306001
Reconstruction and widening project along 3.3 miles of US 191 & Jackrabbit Lane (Montana Highway 85) beginning just south of Four Corners, Mile Marker 81.65 on US 191, then progressing north to the intersection of Huffine and Jackrabbit Lane's (Mile Marker 81.9US 191/Mile Marker 0.0 Jackrabbit Lane) then north to Hulbert Road, Mile Marker 3.05. The project consists of total reconstruction of the highway to a Four-Lane facility with appropriate turning opportunities throughout. Project will be completed or substantially completed by the end of one construction season when let to contract.

Belgrade-South; NH-HSIP 85-1(16)3; CN 4306002
Reconstruction and widening project along 3.0 miles of Jackrabbit Lane (Montana Highway 85) beginning at Hulbert Road, Mile Marker 3.1, then progressing north to Frank Road, Mile Marker 6.1. The project consists of total reconstruction of the highway to a Four-Lane facility with appropriate turning opportunities throughout. Project will be completed or substantially completed by the end of one construction season when let to contract.

Valley Center Road-Secondary 235 (STPS 235)

JCT MT 85- East (West Section); STPS 235-1(9)0; CN 4470
Reconstruction project along 1.9 miles of Valley Center Road (Secondary Highway 235) beginning at Jackrabbit Lane, Mile Marker 0.0, progressing east to Love Lane, Mile Marker 1.9. Project consists of total reconstruction of the highway facility including all drainage features. Project will be completed or substantially completed by the end of one construction season when let to contract.


Gallatin Canyon Projects
Spanish Creek Area: MP 67.9-68.1
Correct Superelevations
Squaw Creek & Castle Rock Inn Area:
MP 64.9-66.0
Slope Flattening
Greek Creek Area: MP 58.3
Construction of a two-way left turn lane
Swan Creek Area: MP 57.3
Reconstruction of the Swan Creek
bridge including a left turn lane
Moose Creek Area: MP 56.2
Construction of a left turn lane
Karst Ranch Area: MP 55.3
Construction of a left turn lane
Jack Smith Bridge Area:
MP 49.6-49.8
Slope Flattening
191
84
Big Sky
Big Sky Area: MP 46.6-43.4
Reconstruction of the West Fork
of the Gallatin Bridge including turn lanes
Big Sky Area: MP 45.0-46.6
Reconstruction/widening of roadway
to include a two-way left turn lane.
N
Projects
Future Construction
In Construction Phase
Red Cliff Campground Area: MP 41.5
Construction of a left turn lane

From:	Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To:	Waring, Amy L -FS
Subject:	FW: Jack Rabbit 161 kV Transmission Line DEIS
Date:	Friday, November 30, 2012 11:07:21 AM

From: William Scharnberg [mailto:hornprof@gmail.com]
Sent: Friday, October 19, 2012 9:29 PM
To: FS-comments-northern-gallatin
Subject: Jack Rabbit 161 kV Transmission Line DEIS

Dear Sir or Madame,

I recently received a letter about the NorthWestern Energy proposal to rebuild and upgrade their existing line. While I have no problem with rebuilding and upgrading the line, any new invasion of the forest seems inappropriate and a threat to the environment. Since there is an existing highway between locations, why not use the shoulder for the entire project? We have a cabin in Greek Creek area and there are roads that exist their so laying a new line does not impact the forest much. However, if a new line is added west of the Gallatin, as the maps indicate, there will be a swath of forest land that is destroyed and a new access to that side of the river that does not currently exist. This invasion will never grow back as fisherman and hikers will then have access to that part of the forest. As it is, the Gallatin is a heavily fished river and this will add more traffic to that side of the river, never to be regained.

Is there a reason that the line can not be laid along Hwy. 191 from Four Corners to Big Sky? The construction costs should be lower, the environmental impact less, and future access to those lines easier. If someone can explain why this project has to cross relatively virgin land, I think it would be appropriate to explain this to at least those who have property on both sides of the Gallatin River. Otherwise the project appears to be a thinly disguised way of creating more access to the river only to serve a bunch of rich folks in Big Sky.

Sincerely,

Bill Scharnberg

From: Dave Dean 6305
To: Patsy Friend 6347; Kevin Lincoln 3314; Steve Linhart 6462;
Subject: FW: your comments to the Forest Service on the DEIS for transmission line upgrade
Date: Thursday, January 03, 2013 9:31:11 AM

FYI

Dave Dean
Biology Department Manager
2041 South Cobalt Point Way
Meridian, ID 83642
208-288-6305-direct
208-608-3191-mobile
208-288-6199-fax
208-288-6100-office

POWER Engineers, Inc.
Energy ¡ Facilities ¡ Communications ¡ Environmental
www.powereng.com

From: Waring, Amy L -FS [mailto:alwaring@fs.fed.us]
Sent: Thursday, January 03, 2013 9:28 AM
To: Dave Dean 6305
Subject: FW: your comments to the Forest Service on the DEIS for transmission line upgrade

For the record

From: Waring, Amy L -FS
Sent: Thursday, December 20, 2012 4:24 PM
To: 'William Scharnberg'
Subject: RE: your comments to the Forest Service on the DEIS for transmission line upgrade

Bill

Glad I could help shed some light on this for you. In light of your concern about increased river access, I also took a look at the location of proposed construction and decking areas. The DEIS evaluates 2 construction yards on Forest Service lands (near Indian Ridge Trail Head and Portal Creek) and 5 decking areas (Sagebrush Point, Swan, Moose Creek, Asbestos and Jack Smith Bridge). The construction yards will serve as field offices, reporting locations for workers, parking space for vehicles and equipment or sites for temporary marshaling of construction materials. Decking areas would be used for temporary storage, collection, handling, sorting and or loading of trees or logs. They are all proposed in open meadows. All of them except Swan are located well away from

the Gallatin River across Hwy 191. Swan is located between Hwy 191 and the river. However, the proposed location is a meadow, and the aerial photo shows the decking area would be separated from the river by a bunch of trees. The area would be used temporarily for tree removal and then the site would be reclaimed. None of the proposed construction and decking areas appear to increase river access.

Amy

From: William Scharnberg [mailto:hornprof@gmail.com]
Sent: Thursday, December 20, 2012 11:53 AM
To: Waring, Amy L -FS
Subject: Re: your comments to the Forest Service on the DEIS for transmission line upgrade

Dear Amy,

OK. I feel a lot better about this proposal. The map that was sent earlier seemed to show that the west side of the Gallatin river would be invaded with equipment – apparently this was the existing line from the 1950s. I think a lot of people worry when any "upgrade" is set to help the very wealthy folks who own starter castles in Big Sky. Sometimes the environment and the property of less wealthy folks gets trampled by those who can and will get what they want. As long as persons like you are looking after the environment and natural resources not found much in the rest of the US, I feel better. Thanks for responding to my comments.

Regards,

Bill

On Thu, Dec 20, 2012 at 12:13 PM, Waring, Amy L -FS <alwaring@fs.fed.us> wrote:
Hi Bill

You recently submitted comments on the Forest Service Draft EIS for a transmission line upgrade from Four Corners to Big Sky. I copied and pasted your comments below. I am hoping I can clear up what seems to be a misunderstanding about the location of the transmission line. The proposed action (Alternative 2) utilizes the same ROW as the existing transmission line, which generally parallels Hwy 191. Alternatives 3 and 4 involve some minor realignments to take the transmission line out of the middle of the Cascade Creek and Cave Creek recreation residence tracts. The Preferred Alternative (Alt 3) would shift the line to the east of Cascade Creek tracts and US Hwy 191, across

the highway from the Gallatin River. Alt 3 also shifts the transmission alignment to the west of Cave Creek Tracts, which is further away from the Gallatin River. Portions of this realignment would occupy an old ROW from a transmission line that existed in the 1950s. I have attached some maps from the DEIS that show these alignments. No new fishing access sites would be created. We are looking at a relatively small amount of timber clearing to widen the ROW to accommodate larger structures (14.8 acres for Alt 2 , 22.4 acres for Alt 3, and 22.5 acres for Alt 4).

Please give me a call (see my number below) if you would like to talk more about what is being proposed. I'm hoping to be able to better understand if there is a specific area you are particularly concerned about. Thank you for your comments.

Amy Waring

I recently received a letter about the NorthWestern Energy proposal to rebuild and upgrade
their existing line. While I have no problem with rebuilding and upgrading the line, any new
invasion of the forest seems inappropriate and a threat to the environment. Since there is an
existing highway between locations, why not use the shoulder for the entire project? We
have a cabin in Greek Creek area and there are roads that exist their so laying a new line
does not impact the forest much. However, if a new line is added west of the Gallatin, as the
maps indicate, there will be a swath of forest land that is destroyed and a new access to that
side of the river that does not currently exist. This invasion will never grow back as
fisherman and hikers will then have access to that part of the forest. As it is, the Gallatin is a
heavily fished river and this will add more traffic to that side of the river, never to be
regained.

Is there a reason that the line can not be laid along Hwy. 191 from Four Corners to Big Sky?

The construction costs should be lower, the environmental impact less, and future access to
those lines easier. If someone can explain why this project has to cross relatively virgin land,
I think it would be appropriate to explain this to at least those who have property on both
sides of the Gallatin River. Otherwise the project appears to be a thinly disguised way of
creating more access to the river only to serve a bunch of rich folks in Big Sky.

Amy Waring, NEPA Planner
Custer / Gallatin National Forests
1310 Main Street
Billings, MT 59105
406-255-1451

812 Senora Avenue
Billings, MT 59105
November 20, 2012

Gallatin National Forest, Bozeman Ranger District
Attn: Amy Waring, NEPA Team Leader
3710 Falcon Street, Suite C
Bozeman, MT 59718

Reference: Jack Rabbit 161 kV Transmission Line – DEIS

Dear Ms. Waring

I am writing in regards to the proposed referenced location options of the transmission line and its impact on cabins in the Cascade Creek area. I am a very interested party to this DEIS in that I currently lease the cabin location at 928 Cascade Creek Road.

It is my strong recommendation that the Forest Service adopt alternative #3, the routing of the transmission line to the east side of the river at Cave and Cascade Creek. Any routing of the transmission line through the Cascade Creek community of summer homes would be a disaster to the pristine beauty and rustic charm of the cabins located in the area. For example, locating and placing the new power line under option 2 would create a clear cut swath through the middle of the community. To us, this would totally ruin the appealing nature of the area. Any value the summer homes would have would be totally destroyed.

Being born and raised in Bozeman, my wife and I have enjoyed the Cascade Creek area, the summer homes located at Cascade Creek, and hiking to Lava Lake and other adjoining trails. Now that we have recently been able to fulfill our dreams of leasing land and having a cabin there, it would be tragic to see the beauty of the wilderness ruined by the placement of the new transmission line. Placement of the transmission line to the east, along the highway, to us would be the ideal location causing the least impact on the environment.

Thank you for the opportunity to comment on this proposal. I hope that your decision will take into account the need not only to update the infrastructure with the new transmission line, but also to maintain the pristine nature and beauty of this area.

Regards,

Dave and Maryellen Scherer

From: Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To: Waring, Amy L -FS
Subject: FW: Jack Rabbit 161K Transmission Line DEIS
Date: Tuesday, December 04, 2012 10:43:48 AM

From: Jeannie & Charlie Steelman [mailto:cjsteel5@bellsouth.net]
Sent: Monday, December 03, 2012 2:56 PM
To: FS-comments-northern-gallatin
Subject: Jack Rabbit 161K Transmission Line DEIS

My family has been a forest lease holder at the cave creek track for many years. I would like to express my support of the proposed move of the power line up the mountain. This move will help increase our property value and also help by cutting down on the electromagnetic field danger.

Sincerely,

Jean M. Steelman

From:	Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To:	Waring, Amy L -FS
Subject:	FW: Jack Rabbit 161kV Transmission Line DEIS - DOI Comments
Date:	Friday, November 30, 2012 11:05:01 AM
Attachments:	Jack Rabbit 161kV Transmission Line DEIS - DOI Comments.pdf

From: Robert Stewart [mailto:robert_f_stewart@ios.doi.gov]
Sent: Thursday, November 29, 2012 2:54 PM
To: FS-comments-northern-gallatin
Cc: Seth, Teri -FS
Subject: Jack Rabbit 161kV Transmission Line DEIS - DOI Comments

PLEASE ACKNOWLEDGE RECEIPT BY REPLY TO THIS MESSAGE

The Department of the Interior's comments on the subject document are attached.

If you require paper-copy, please so advise.

Robert F. Stewart
Regional Environmental Officer
Office of Environmental Policy and Compliance
U.S. Department of the Interior
P.O. Box 25007 (D-108)
Denver, CO 80225-0007
Voice: (303) 445-2500
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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Denver Federal Center, Building 67, Room 118
Post Office Box 25007 (D-108)
Denver, Colorado 80225-0007

November 29, 2012

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ER 12/770

Mary Erickson, Forest Supervisor
P.O. Box 130
Bozeman, MT 59771

Dear Ms. Erickson:

The U.S. Department of the Interior has reviewed the Draft Environmental Impact Statement for the Jack Rabbit to Big Sky Meadow Village 161 kV Transmission Line Upgrade, Bozeman Ranger District, Gallatin National Forest, Gallatin County, MT, and has no comments on the document.

Sincerely,

Robert F. Stewart
Regional Environmental Officer

cc: Lisa Stoeffler, Bozeman District Ranger
Teri Seth, NEPA Team Leader

From:	Seth, Teri -FS on behalf of FS-comments-northern-gallatin
To:	Waring, Amy L -FS
Subject:	FW: Jack Rabbit 161K Transmission Line DEIS
Date:	Tuesday, December 04, 2012 10:43:57 AM

From: dawn tol [mailto:dawnmarieski@gmail.com]
Sent: Monday, December 03, 2012 11:09 AM
To: FS-comments-northern-gallatin
Subject: Jack Rabbit 161K Transmission Line DEIS

Dear Sirs/Madams

My husband and I have had the incredible pleasure of being invited to spend time as the guests of one of your leaseholders at Cave Creek. As we are certain you are already well aware, it is an incredible experience in both the winter and summer times. We understand from the lessees that you are giving consideration to moving the powerlines west, up the mountain (Alternative 3).

As much as we have enjoyed the time we have spent at Cave Creek, we have no doubt that moving the powerlines will add positively to our future stays, as the natural beauty can only be enhanced by the removal of the associated noise and visual interruption. We hope you will determine this is the appropriate course of action for both practical and aesthetic reasons; and we look forward to our next visit to this beautiful area.

Sincerely,

Dawn-Marie & Robert Tol

W
Anne Woodruff
54740 Gallatin Rd.
Gallatin Gateway, MT 59730

October 21, 2012 995-4856

Attention: Amy Waring
Subject: Jack Rabbit 161 kV Transmission line DEIS

The proposed Jack Rabbit 161 kV transmission line DEIS will run just feet from our property line in the Gallatin Canyon. Of course no one wants a power line of this magnitude in their backyard. One of my concerns is the added (more than double) radiation that we'll be exposed to living so close to the line. Having lived in the canyon for over thirty years I've seen lots of change and I hope the health and well-being of the canyon residents will be considered as well as the environmental impact.

Thank-you.

Sincerely,
Anne Woodruff